Permitting Decisions- Bespoke Permit

We have decided to grant the permit for Ditchford Bank Farm operated by Ian Few, John Few, Jane Mary Few, and Adrian Few.

The permit number is EPR/JP3604MJ.

The application is for the rearing of poultry for up to 200,000 broiler places in four poultry houses.

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

Purpose of this document

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

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

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

Read the permitting decisions in conjunction with the environmental permit.

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 ‘Technical Standards’ dated 09/06/2022 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	The Applicant has confirmed it will demonstrate that the installation achieves levels of Nitrogen excretion below the required BAT-AEL of 0.6 kg N/animal place/year by

BAT measure	Applicant compliance measure
- Nitrogen excretion	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 0.25 kg P_2O_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 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: • Twice daily olfactory checks coinciding with stock inspections (normally 07.00-10.00 hrs and 16.00-18.00hrs) any abnormalities recorded and investigated. • Checks will also be performed weekly by means of “sniff testing” at the monitoring points by persons not involved directly with the operations at the installation.

BAT measure	Applicant compliance measure
BAT 27 Monitoring of emissions and process parameters - Dust emissions	Table S3.3 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 NH3/animal place/year. The Applicant will meet this as the emission factor for broilers is 0.034 kg NH3/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 the 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)

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 Ditchford Bank Farm (dated 09/06/2022) 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 exclude 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:

- Broiler rearing.
- Feed delivery and storage.
- Air dispersal via the in-house ventilation system.
- Litter quality.
- Carcass storage.

- Depopulating of the poultry sheds.
- House clean out (de-littering).
- House clean out (disinfection and fumigation).
- Wash water management.

Odour Management Plan Review

There are sensitive receptors within 400 meters of the installations therefore Odour Management Plan has been submitted.

There are 4 sensitive receptors for odour within 400 metres of the installation.

The closest sensitive receptor to odour is a residential dwelling which is approximately 258m northwest of the poultry houses.

This plan is considered acceptable having been assessed against the requirements of SGN EPR6.09 How to comply with your environmental permit for intensive farming, Appendix 4 of How to comply with your environmental permit for Intensive Farming, H4 Odour Management and NFU Poultry Industry Good Practice Checklist.

The Odour Management Plan includes procedural odour control measures for bird housing, carcass storage and disposal, litter removal, washing operations and house clean-out, feed storage and delivery, ventilation system, and dirty water management. These mitigation measures include but are not limited to the following odour-reducing procedures:

- High-velocity roof fans on all houses will help prevent odour issues at the site as the higher efflux velocity will aid the dispersion of odour-reducing concentrations at nearby receptors.
- Insulated walls and ceilings to prevent condensation.
- Ventilation is regularly adjusted to bird age and size and humidity and relative temperature both internally and externally. The increase will involve using more of the side fans to move more air and remove moisture from the poultry houses.
- Use of nipple drinkers to minimise spillage and control in-house humidity.
- Daily checks on drinker lines to identify leaks.
- Specialist UKASTA-accredited feed will be used with adjusted protein and phosphorus levels resulting in reduced ammonia content in the litter.
- Feed delivery systems are sealed to minimise odour; feed bin area is checked daily checks to ensure no leaks are evident.
- Carcasses are collected daily and placed in sealed containers.
- No litter is stored on site after a cycle is complete, it is removed during the cleanout process. Litter is covered before taken off site.

If the initial odour mitigation measures above do not prove to be sufficient in the case that substantiated odour complaints are received, the operator will notify the Environment Agency immediately and implement contingency measures followed by conducting sniff tests to ensure the effectiveness of implemented mitigation actions. Following a complaint, the operator will review Odour Management Plan at the earliest opportunity with any changes communicated to the Environment Agency for approval.

There is the potential for odour pollution from the installation, however, the operator's compliance with their Odour Management Plan, submitted with this application, should minimise the risk of odour pollution beyond the installation boundary. The Odour Management Plan is to be reviewed annually with any changes to be communicated to the Environment Agency for approval.

The risk of odour pollution at sensitive receptors beyond the installation boundary is not considered significant. We, the Environment Agency, have reviewed and approved the Odour Management Plan and consider it complies with the requirements of our H4 Odour management guidance note and is in line with 21/02/2017 BAT conclusions document measure 12. 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.

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 above. The Operator has provided an NMP as part of the application supporting documentation, and further details are provided below.

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:

- Ventilation fans.
- Feed deliveries.
- Feeding systems.
- Fuel deliveries.
- Alarms systems.
- Bird catching.
- Clean out operations.
- Maintenance and repairs.
- Set up and placement.
- Biomass boilers.

Noise Management Plan Review

We consider that the noise and vibration management plan is satisfactory, and we approve this plan.

We have approved the noise and vibration management plan as we consider it to be appropriate measures based on the information available to us at the current time. The applicant should not take our approval of this plan to mean that the measures in the plan are considered to cover every circumstance throughout the life of the permit.

The applicant should keep the plans under constant review and revise them annually or if necessary, sooner if there have been substantiated complaints arising from operations on-site or if circumstances change. This is in accordance with our guidance ‘Control and monitor emissions for your environmental permit’.

The closest sensitive receptor to odour is a residential dwelling which is approximately 258m northwest of the poultry houses.

The Noise Management Plan covers control measures for noise-generating activities listed above with a particular focus on the design and frequent maintenance of ventilation fans, feed deliveries, alarm systems, on-site vehicle movements, maintenance and repair, bird catching and clean out operations. These mitigation measures include but are not limited to the following noise-reducing procedures:

- On-site speed will be limited with no deliveries occurring at night. Vehicles with fitted reversing warning alarms only operate during daylight hours.
- Litter removal and wash down will be carried out during normal working hours.
- Biomass boilers will be fully enclosed within a building.
- Maintenance and repair of the concrete apron/access road to minimise impact noise.
- Fans will be maintained regularly to avoid excessive noise.

- Gable end fans are only to be used if ridge fans are not able to provide the required ventilation due to failure or during periods of high external temperatures.

There is the potential for noise from the installation beyond the installation boundary, however, the operator's compliance with the Noise Management Plan, submitted with this application, should minimise the risk of noise pollution beyond the installation boundary. The risk of noise pollution at sensitive receptors beyond the installation boundary is therefore not considered significant. We agree with the scope and suitability of the key measures addressed, 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.

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.

Biomass Boilers

The Applicant is installing 2 biomass boiler(s) with a net rated thermal input of 2.2 MW.

This does not fall under a 1.1 activity as thermal input does not exceed 50MW. This does not fall under a 5.1 activity as the applicant is not burning waste.

As this exceeds the threshold of 1MW, each biomass boiler is bound by the Medium Combustion Plant Directive. The operator has been made aware of the implications associated with this. The operator has confirmed that the site will:

- Comply with Oxides of Nitrogen (NOx) and particulate emission limit values;
- Perform NOx, particulate and carbon monoxide monitoring
- Provide specific stack design for monitoring points;
- Reporting/recording of monitoring;

The subsistence charge(s) associated with this boiler / MCP fall under the scope of relevant time and materials costs (as it does not fall within the scope of Table 2.10 of the EA Charging Scheme).

In accordance with the Environment Agency's Air Quality Technical Advisory Guidance 14: "for combustion plants under 5MW, no habitats assessment is required due to the size of combustion plant". Therefore this proposal is considered acceptable and no further assessment is required.

Ammonia

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

There are 0 Special Area(s) of Conservation (SAC), /Special Protection Area(s) (SPA), /Ramsar sites located within 10 kilometres of the installation. There are 8 Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also 10 Local Wildlife Site(s) (LWS), /Ancient Woodland(s) (AW), Local Nature Reserve(s) (LNR) within 2 km of the installation.

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 4.5 has indicated that emissions from Ditchford Bank Farm will only have a potential impact on SSSI(s) with a precautionary CLe of 1µg/m^3 if they are within 1048 metres of the emission source.

Beyond 1048m the PC is less than 0.2µg/m^3 (i.e. less than 20% of the precautionary 1µg/m^3 CLe) and therefore beyond this distance the PC is insignificant. In this case the/all SSSI(s) is/are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1µg/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 1µg/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 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Wylde Moor, Feckenham	3,862
Foster's Green Meadows	1,167
Hewell Park Lake	5,244
Pipershill Common	3,137
Trickses Hole	1,267
Rookery Cottage Meadows	2,324

Stock Wood Meadows	5,100
Dean Brook Valley Pastures	5,233

Ammonia assessment - LWS/AW/LNR

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 Ditchford Bank Farm will only have a potential impact on the LWS/AW/NNR site(s) with a precautionary CLe of 1µg/m^3 if they are within 359 metres of the emission source.

Beyond 359m the PC is less than 1µg/m^3 and therefore beyond this distance the PC is insignificant. In this case all LWS/AW/LNR(s) are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 2 – LWS/AW/LNR Assessment

Name of SAC/SPA/Ramsar	Distance from site (m)
Foster's Green Meadows	1,167
The Thrift	2,030
Bradley Green & Flying Horse Lane Meadows	1,551
Littleworth Farm Meadows	1,114
Berrow Hill (& Littleworth Orchard / Meadows)	1,483
Bow, Shell, Swan and Seeley Brooks	598
Fishpools Cottage Meadow	2,038
Burial Lane	1,907
Brook Range	2,105
The Thrift	2,029

Decision considerations

Confidential information

A claim for commercial or industrial confidentiality has not been made.

The decision was taken in accordance with our guidance on confidentiality.

Identifying confidential information

We have not identified information provided as part of the application that we consider to be confidential.

The decision was taken in accordance with our guidance on confidentiality.

Consultation

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

The application was publicised on the GOV.UK website.

We consulted the following organisations:

- Director of Public Health and UKHSA (formerly PHE)
- Local Authority – Environmental Health
- Health and Safety Executive (HSE)

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

Operator

We are satisfied that the applicant (now the operator) is the person who will have control over the operation of the facility after the grant of the permit. The decision was taken in accordance with our guidance on legal operator for environmental permits.

The regulated facility

We considered the extent and nature of the facility at the site in accordance with RGN2 ‘Understanding the meaning of regulated facility’, Appendix 2 of

RGN2 ‘Defining the scope of the installation’, Appendix 1 of RGN 2 ‘Interpretation of Schedule 1’.

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 site

The operator has provided plans which we consider to be satisfactory.

These show the extent of the site of the facility.

The plan is included in the permit.

Site condition report

The operator has provided a description of the condition of the site, which we consider is satisfactory. The decision was taken in accordance with our guidance on site condition reports.

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

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

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

Please see the Ammonia section of key issues above, to see how we determined the impact of ammonia on habitats.

We have not consulted Natural England.

The decision was taken in accordance with our guidance.

Environmental risk

We have reviewed the operator's assessment of the environmental risk from the facility.

The operator’s risk assessment is satisfactory.

General operating techniques

We have reviewed the techniques used by the operator and compared these with the relevant guidance notes and we consider them to represent appropriate techniques for the facility.

The operating techniques that the applicant must use are specified in table S1.2 in the environmental permit.

National Air Pollution Control Programme

We have considered the National Air Pollution Control Programme as required by the National Emissions Ceilings Regulations 2018. By setting emission limit values in line with technical guidance we are minimising emissions to air. This will aid the delivery of national air quality targets. We do not consider that we need to include any additional conditions in this permit.

Odour management

We have reviewed the odour management plan in accordance with our guidance on odour management.

The plan has been incorporated into the operating techniques S1.2 under the scope of application documents referenced in application form B3.5

Please see the odour section of key issues section for further information.

Noise and vibration management

We have reviewed the noise and vibration management plan in accordance with our guidance on noise assessment and control.

The plan has been incorporated into the operating techniques S1.2 under the scope of application documents referenced in application form B3.5

Please see the noise section of key issues section for further information.

Emission Limits

Emission Limit Values (ELVs) based on Best Available Techniques (BAT) have been added for the following substances:

- Ammonia emissions
- Nitrogen excretion
- Phosphorus excretion

Please see the BAT conclusion review of the key issues section for further information.

Monitoring

We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.

These monitoring requirements have been included in accordance with the BAT conclusions.

Reporting

We have specified reporting in the Table S4.1 of the permit.

We made these decisions in accordance with the BAT conclusions.

Management System

We are not aware of any reason to consider that the operator will not have the management system to enable it to comply with the permit conditions.

The decision was taken in accordance with the guidance on operator competence and how to develop a management system for environmental permits.

Previous performance

We have assessed operator competence. There is no known reason to consider the applicant will not comply with the permit conditions.

No relevant convictions were found. The operator satisfies the criteria in our guidance on operator competence.

Financial competence

There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.

Growth duty

We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to grant this permit.

Paragraph 1.3 of the guidance says:

“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”

We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.

We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.

Consultation Responses

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

Responses from organisations listed in the consultation section:

Response received from UK Health Security Agency.

Brief summary of issues raised:

The main emissions of potential public health significance are emissions to air of bioaerosols, and dust including particulate matter and ammonia.

Response received from Local Authority:

No objection to the application in terms of any noise, odour or dust nuisance.

Summary of actions taken:

1. **The impact of dust and bioaerosols on human health.**

The impact of dust and bioaerosols on human health has been addressed in the key issues section. As there are no receptors within 100 metres from the installation, there is no need to produce and submit a dust and bioaerosol management plan with the application. We are satisfied that risk and mitigation measures associated with dust and bioaerosol emission are addressed in the revised odour management plan and technical standards. The operation of the farm will be in accordance with SGN EPR6.09 ‘How to comply with your environmental permit for intensive farming’ which will minimise the potential for dust and bioaerosol emissions from the installation. We have sufficient controls within the permit conditions to enable further measures to be implemented should these be required.

2. **The impact of ammonia on human health.**

Potential adverse effects of ammonia include respiratory irritation and may also give rise to odour complaints. Levels of ammonia in ambient air will decrease rapidly with distance from a source. Public Health England has indicated (Position Statement, Intensive Farming, 2006) that it is unlikely that ammonia

emissions from a well-run and regulated farm would be sufficient to cause ill health.

Odour complaints made to the Operator, which may be an indicator of high ammonia levels, should be recorded and reported to the Environment Agency. The Environment Agency will keep the position under review as part of its ongoing regulation of the site.

The operator has confirmed that the Installation will be operated and managed in accordance with BAT. The full review of the ammonia impact has been addressed in the key issues.

We consider the proposed operating measures are appropriate and should minimise the potential for emissions from the Installation.

We conclude that ammonia is unlikely to cause a problem to human receptors from the installation, given the conditions imposed by the permit.

The following organisations were consulted, with a deadline for responses of 09/05/2023, however, no responses were received:

- Health and Safety Executive.

In addition, the application was publicised on the www.gov.uk website, with a deadline for comments of 09/05/2023, but no comments were received.