

Permitting decisions

Bespoke permit

We have decided to grant the permit for Weavers Meadow Farm operated by Mr Chris Down & Mrs Katie Down. The permit number is EPR/BP3902LE.

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 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 relevant BAT conditions for the new installation in their document titled Technical Standards, revised version submitted on 14/03/24, 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 <ul style="list-style-type: none"> • Weaners (rearing of pigs up to 15kg): 4.0kg N/animal place/year • Pigs >30kg: 2.6 kg NH3/animal place/year. • Sows: 30.0kg N/animal place/year • Farrowing sows: 30.0kg N/animal place/year by an estimation using manure analysis for total Nitrogen content. A multiphase feeding strategy will be implemented. 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 <ul style="list-style-type: none"> • Weaners (rearing of pigs up to 15kg): 2.2kg P₂O₅ animal place/year. • Pigs >30kg: 2.6 kg NH3/animal place/year. • Sows: 15kg P₂O₅ animal place/year

BAT measure	Applicant compliance measure
	<ul style="list-style-type: none"> Farrowing sows: 15kg P₂O₅ animal place/year by an estimation using manure analysis. Multiphase feeding strategy will be implemented. 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. Estimation by using a mass balance based on the excretion and the total (or total ammoniacal) nitrogen present at each manure management stage.
BAT 26 Monitoring of emissions and process parameters - Odour emissions	The approved odour management plan (OMP) includes the following details for on Farm Monitoring and Continual Improvement: Daily checks include sniff testing to monitor odour emissions to detect abnormally high odours and contingency Measures.
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 estimation using emission factors.
BAT 30 Ammonia emissions from pig houses	The Applicant has confirmed it will demonstrate that the installation achieves levels of ammonia below the required BAT-AEL for the following pig types: <ul style="list-style-type: none"> Weaners (rearing of pigs up to 15kg): 0.53 kg NH₃/animal place/year. Pigs >30kg: 2.6 kg NH₃/animal place/year. Sows: 2.7 kg NH₃/animal place/year. Farrowing sows: 5.6 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 – BAT conclusion 30

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

'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.

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/PSF 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.

The standard emission factor for farrowers on FSF/PSF with a vacuum system is 5.84, whereas the BAT AEL is 5.6. Based on occupancy at 80%, using Technique a (i) which is to reduce the ammonia emitting surface and frequent vacuum Slurry removal the BAT AEL can be met.

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 Weavers Meadow Farm (dated 30/08/22) 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:

Pig production, cleaning out, feed storage, use of machinery, disposal of carcasses, slurry/manure spreading and waste storage.

Odour Management Plan Review

The installation is located within 400m of sensitive receptors, which are residential properties. The Operator is required to manage activities in accordance with condition 3.3.1 of the permit and the site OMP.

The OMP submitted on 27/03/24 includes the following key measures to minimise odour and odour risks:

- Daily checks include sniff testing to monitor odour emissions to detect abnormally high odours.
- Feed is UFAS approved and formulated for reduced protein and for the pigs needs. The farm operates its own mill and mix plant, machinery is specifically designed to minimise dust and therefore odour. All feed is dry and stored in enclosed feed silos with vents. These vents are connected to a cyclone dust collector. Any spillages will be cleared up immediately by farm staff.
- Temperature is computer controlled on the fan ventilated buildings and manually (by way of opening vents) on naturally ventilated buildings with daily monitoring carried out by farm staff.
- All pigs checked twice daily by farm staff to monitor health, any signs of disease are treated as required and, where necessary, identified pig is moved to hospital accommodation for closer monitoring.
- Feeders are constructed to minimise waste, bowl drinkers / nipple drinkers are used to reduce water wastage.
- Slurry lagoon on site covered to reduce odour on site. SSAFO compliant slurry reception pit, SSAFO compliant bunker catchment pit as well as the SSAFO compliant covered lagoon.
- Slurry removed at least every 12 weeks to ensure a continuous void between the slurry and the slats and operate to BAT. Mobile slurry stirrers may (as necessary) be used (every 4 weeks for 3 days) within dry sow buildings to keep slurry homogenised. This stirrer will only be used during working hours. This will be done by farm staff.
- Yard areas (loading bay) are cleaned within 2 hours of loading being completed.
- All carcasses are stored in lockable and covered bins (which are kept in a lockable steel container) before on farm incineration within 48 hrs. unless being put directly into the lockable incinerator for incineration within 24 hrs. Dead pigs are transported to incinerator in the locked deadstock bins, with lids closed.
- Location of incinerator is based towards the NE of the site to allow for prevailing SW wind to take exhaust away from nearest receptor.

The OMP also includes contingency measures for abnormal operations, such as largescale spillages, poor feed quality, slurry capacity shortage, significant disease, failure of infrastructure and abnormal weather conditions.

The plan will be reviewed every year, in the event of any building and management changes or following any complaint. The OMP includes a complaints procedure.

Conclusion

We have reviewed the OMP in accordance with our guidance on odour management. We consider that the OMP is satisfactory. We are satisfied that the measures outlined in the plan will minimise the risk of odour pollution beyond the installation boundary.

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:

Cleaning out, feed storage, use of machinery, use of vehicles, slurry/manure spreading and power failure.

Noise Management Plan Review

The installation is located within 400m of sensitive receptors, which are residential properties. The Operator is required to manage activities in accordance with condition 3.4.1 of the permit and the site NMP.

The NMP submitted on 13/01/24 includes the following key measures to minimise noise and noise risks:

- Pigs are ad lib fed where possible, other sows are fed once a day in the morning and during working hours.
- Feed deliveries inside of normal working hours (7am to 8pm). Emergency out of hour deliveries will be kept to a minimum.
- Minimal pig movements - only moved during the day and maintained in stable batches. No pigs moved around site outside. Normal work hours 7am – 6pm weekdays.
- Pig loading bay out of sight of nearest receptor and noise screened by building.
- Deliveries during normal working hours by arrangement, 7am-6pm weekdays.
- All contractors and staff to use mobiles for communication on site after 8pm.
- Slurry tanker filling and emptying not possible to control if weather conditions are favourable to reduce odour, but otherwise normal working hours 7 am – 8 pm. Engine revs kept low where possible.
- Machine idling is minimised where cutting engine will not result in efficiency losses to running of the site. Typically idling for longer than 1 minute will require the engine to be stopped.
- Fans well maintained to reduce noise and only operated when needed.
- Standby generator operated for a maximum of one hour per month and only within normal working hours (7am-6pm weekdays).

The NMP also includes contingency measures for abnormal operations, such as overstocking, pig bullying, failure of infrastructure and abnormal weather conditions.

The plan will be reviewed every year, in the event of any building and management changes or following any complaint. The NMP includes a complaints procedure and an example of the odour complaint report form.

Conclusion

We have assessed the NMP and the H1 risk assessment for noise and conclude that the Applicant has followed the guidance set out in EPR 6.09 Appendix 5 'Noise management at intensive livestock installations'. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution / nuisance.

Dust and Bio aerosols

The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the permit (the 'Fugitive Emissions' conditions) to provide a level of protection. Condition 3.2.1 'Emissions of substances not controlled by an emission limit' is included in the permit. This is used in conjunction with condition 3.2.2 which states that in the event of fugitive emissions causing pollution following commissioning of the installation, the Operator is required to undertake a review of site activities, provide an emissions management plan and to undertake any mitigation recommended as part of that report, once agreed in writing with the Environment Agency.

There is one sensitive receptor within 100m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 25 metres to the east of the installation boundary.

The Applicant has provided a dust and bio aerosol risk assessment.

In addition, guidance on our website concludes that Applicants need to produce and submit a dust and bio aerosol management plan beyond the requirement of the initial 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 management 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 the 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 in the Dust Management Plan submitted on 13/02/24:

- Feed delivery systems are sealed to minimise atmospheric dust.
- All feed is stored in enclosed feed bins with dust collector cyclone vents.
- All pens and stock checked for cleanliness as part of daily welfare routines by farm staff.
- All pens and buildings cleaned out in accordance with written cleaning plan, available in the farm office.
- Incinerator maintained and serviced as per manufactures specifications using an outside qualified contractor.
- Site drainage designed to keep clean uncontaminated water separate from dirty water and slurry with the use of kerbing and the on-site management which only means the loading bays are areas that could become dirty.

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 are no Special Areas of Conservation (SAC) /Special Protection Areas (SPA) or Ramsar sites located within 10 kilometres of the installation. There are no Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are two Local Wildlife Site(s) (LWS) and one Ancient Woodland (AW) within 2 km of the installation.

Ammonia assessment - LWS/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 dated 22/04/24 has indicated that emissions from Weavers Meadow Farm will only have a potential impact on the LWS/AW sites with a precautionary CLe of $1\mu\text{g}/\text{m}^3$ if they are within 857 metres of the emission source.

Beyond 857 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/AW sites are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 1 – LWS/AW Assessment

Name of LWS/AW	Distance from site (m)
Knight's Wood LWS	1782
Weekes Farm Orchard LWS	1759
Peperstone Embankment LWS	1528
Knight's Wood AW	1781

No further assessment is necessary.

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: Local Authority – Planning Local Authority – Environmental Health Health and Safety Executive Director of Public Health & UKHSA (formerly PHE) English Heritage The comments and our responses 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'. 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	
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. <ul style="list-style-type: none"> • Knight's Wood LWS and AW

Aspect considered	Decision
	<ul style="list-style-type: none"> • Weekes Farm Orchard LWS <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 not consulted Natural England on the application. The decision was taken in accordance with our guidance.</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>
Odour management	<p>We have reviewed the odour management plan in accordance with our guidance on odour management.</p> <p>We consider that the odour management plan is satisfactory.</p>
Noise management	<p>We have reviewed the noise management plan in accordance with our guidance on noise assessment and control.</p> <p>We consider that the noise management plan is satisfactory.</p>
Permit conditions	
Use of conditions other than those from the template	<p>Based on the information in the application, we consider that we do not need to impose conditions other than those in our permit template.</p>
Emission limits	<p>ELVs and/or equivalent parameters or technical measures based on BAT have been set for the following substances.</p> <ul style="list-style-type: none"> • ammonia • nitrogen • phosphorous
Monitoring	<p>ELVs and/or equivalent parameters or technical measures based on BAT have been set for the following substances.</p> <p>insert details of the substances identified.</p> <ul style="list-style-type: none"> • ammonia • nitrogen

Aspect considered	Decision
	<ul style="list-style-type: none"> phosphorous
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	<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	<p>There is no known reason to consider that the operator will not be financially able to comply with the permit conditions.</p>
Growth Duty	
Section 108 Deregulation Act 2015 – Growth duty	<p>We have considered our duty to have regard to the desirability of promoting economic growth set out in section 108(1) of the Deregulation Act 2015 and the guidance issued under section 110 of that Act in deciding whether to vary this permit.</p> <p>Paragraph 1.3 of the guidance says:</p> <p>“The primary role of regulators, in delivering regulation, is to achieve the regulatory outcomes for which they are responsible. For a number of regulators, these regulatory outcomes include an explicit reference to development or growth. The growth duty establishes economic growth as a factor that all specified regulators should have regard to, alongside the delivery of the protections set out in the relevant legislation.”</p> <p>We have addressed the legislative requirements and environmental standards to be set for this operation in the body of the decision document above. The guidance is clear at paragraph 1.5 that the growth duty does not legitimise non-compliance and its purpose is not to achieve or pursue economic growth at the expense of necessary protections.</p> <p>We consider the requirements and standards we have set in this permit are reasonable and necessary to avoid a risk of an unacceptable level of pollution. This also promotes growth amongst legitimate operators because the standards applied to the Operator are consistent across businesses in this sector and have been set to achieve the required legislative standards.</p>

Consultation

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

The consultation ended on 01/03/23.

Responses from organisations listed in the consultation section

Response received from
Mid Devon District Council - Planning on 02/03/23
Brief summary of issues raised
No concerns raised in respect of the application.
Summary of actions taken or show how this has been covered
No actions required.

Response received from
Historic England on 03/02/23
Brief summary of issues raised
No comments relative to our remit.
Summary of actions taken or show how this has been covered
N/A

Response received from
UK Health Security Agency (UKHSA) on 17/02/23 and 20/02/24
Brief summary of issues raised
<p><u>First response (received on 17/02/23):</u></p> <p>UKHSA considers the main emissions of potential public health significance are emissions to air of bioaerosols, dust including particulate matter and ammonia. Notes some odour complaints have been received relating to this site. Odour issues can cause a potential nuisance and should be controlled by the applicant's odour management plan.</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. UKHSA considers that the documentation submitted does not provide a clear description of what the permit variation is for and therefore the application does not allow evaluation of their risk assessment. It is recommended that a clear statement is provided which outlines what exactly is being applied for and how this will alter emissions which could impact on public health.</p>
<p><u>Second response (received on 20/02/24):</u></p> <p>UKHSA considers the main emissions of potential public health significance are emissions to air of bioaerosols,</p>

dust including particulate matter and ammonia. It is noted that the potential for bioaerosols hasn't been considered, despite the proximity of a residential property. The Environment Agency may wish to ensure that emissions of bioaerosols are controlled and do not impact off-site residential receptors.

Summary of actions taken or show how this has been covered

Updated consultation documents, comprising revised application documents and an application summary, sent on 26/01/24.

Comments regarding bioaerosols:

The Applicant submitted a revised Dust Management Plan (DMP) on 13/01/24. We are satisfied that the measures outlined in the application and DMP will minimise the potential for dust and bioaerosol emissions from the installation.

Please refer to the [key issues](#) section for further details.

Response received from

Devon County Council – Public Health Devon on 28/02/23 and 06/02/24

Brief summary of issues raised

First response (received on 17/02/23):

The documentation submitted does not provide a clear description of what the permit variation is for and support UKHSA's recommendation that a clear statement is provided which outlines what exactly is being applied for and how this will alter emissions which could impact on public health.

Second response received on 06/02/24

No further comments to make on the application.

Summary of actions taken or show how this has been covered

Updated consultation documents, comprising revised application documents and an application summary, sent on 26/01/24.

No further action required.

No responses were received from the following:

- Local Authority – Environmental Health.
- Health and Safety Executive.
- Members of the public via web publication.