

Permitting decisions

Bespoke permit

We have decided to grant the permit for Thurlby Farm operated by L.J. Fairburn and Son Limited.

The permit number is EPR/ TP3221SS.

The installation comprises two poultry houses which operate a multi-tier aviary system for free range laying hens. The two poultry houses provide a combined capacity for 64,000 bird places.

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

Intensive Rearing of Poultry or Pigs BAT Conclusions document

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

The BAT Conclusions document is as per the following link:

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

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

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

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

New BAT Conclusions review

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

We sent out a not duly made request for information, requiring the Applicant to confirm that the new installation complies in full with all the BAT Conclusion measures.

The Applicant has confirmed their compliance with all BAT conclusions and BAT-AELs for the new installation in their document reference 'BAT Compliance' and dated 23/07/2024 which has been referenced in Table S1.2 Operating Techniques of the permit.

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

BAT measure	Applicant compliance measure
BAT 3 - Nutritional management - Nitrogen excretion	The Applicant has confirmed it will demonstrate that the installation achieves levels of Nitrogen excretion below the required BAT-AEL of 0.8 kg N/animal place/year by an estimation using manure analysis for total Nitrogen content, and will use BAT 3b technique using different feeds adapted to the specific requirements of the production period.
BAT 4 - Nutritional management - Phosphorus excretion	The Applicant has confirmed it will demonstrate that the installation achieves levels of Phosphorus excretion below the required BAT-AEL of 0.45 kg P ₂ O ₅ /animal place/year by an estimation using manure analysis for total Phosphorus content, and will use BAT 4a technique reducing the phosphorus content over the production cycle.
BAT 24 -Monitoring of emissions and process parameters - Total nitrogen and phosphorous excretion	Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions. This will be verified by means of manure analysis and reported annually.
BAT 25 - Monitoring of emissions and process	Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

BAT measure	Applicant compliance measure
parameters - Ammonia emissions	Ammonia emissions will be reported to the Environment Agency annually by an estimation using emission factors.
BAT 26 - Monitoring of emissions and process parameters - Odour emissions	<p>The approved odour management plan (OMP) includes the following details for odour monitoring:</p> <ul style="list-style-type: none"> • Daily odour checks carried out; checking for any abnormal levels or potential for increased odour production. • Sniff testing at the boundary undertaken at least weekly. Where there is potential for abnormal elevated odour emission, control measures will be put in place to mitigate the risk. • If an odour problem arises, monitoring will be carried out to establish what needs to be done.
BAT 27 - Monitoring of emissions and process parameters - Dust emissions	<p>Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.</p> <p>The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by an estimation using emission factors.</p>
BAT 31 - Ammonia emissions from poultry houses - Laying hens	The BAT-AEL to be complied with is 0.13 kg NH ₃ /animal place/year. The Applicant will meet this as the emission factor for layers with aviary type housing is 0.08 kg NH ₃ /animal place/year.

More detailed assessment of specific BAT measures

Ammonia emission controls

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

Ammonia emission controls – BAT conclusion 31

The BAT Conclusions include a set of BAT-AELs for ammonia emissions to air from animal housing for laying hens.

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

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

Industrial Emissions Directive (IED)

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

Groundwater and soil monitoring

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

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

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

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

The site condition report (SCR) for Thurlby Farm (revised version submitted 27/09/2024) 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.

Odour Management Plan Review

There are 7 sensitive receptors within 400 metres of the installation boundary, the nearest receptor is located approximately 12 metres to the north of the installation boundary and approximately 280 metres north of the nearest poultry house. The operator has provided an OMP that has been assessed against the requirements of EPR 6.09 (version 2) Appendix 4 guidance 'Odour Management at Intensive Livestock Installations', the 'Poultry Industry Good Practice Checklist' version 2, August 2013, and 'H4 Odour management guidance note'. The OMP, dated September 2024, sets out the preventative measures that will be taken at the installation as part of the daily management of odour risk at the site.

The OMP includes contingency measures to minimise odour pollution during abnormal operations. A list of remedial measures is included in the contingency plan, including triggers for commencing and ceasing use of these measures.

The OMP also provides a suitable procedure in the event that complaints are made to the Operator and includes a complaint form template.

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

Conclusion

We have assessed the OMP and the H1 risk assessment for odour and conclude that the Applicant has followed the above guidance. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of odour pollution/nuisance. The operator is required to manage activities in accordance with condition 3.3.1 of the permit and this OMP.

Noise

Intensive farming by its nature involves activities that have the potential to cause noise pollution. This is recognised in our 'How to Comply with your Environmental Permit for Intensive Farming' EPR 6.09 guidance. Under section 3.4 of this guidance, a Noise Management Plan (NMP) must be approved as part of the permitting determination if there are sensitive receptors within 400m of the installation boundary.

Condition 3.4 of the permit reads as follows:

"Emissions from the activities shall be free from noise and vibration at levels likely to cause pollution outside the site, as perceived by an authorised officer of the Environment Agency, unless the operator has used appropriate measures, including, but not limited to, those specified in any approved noise and vibration management plan, to prevent or where that is not practicable to minimise the noise and vibration".

The risk assessment for the installation provided with the application lists key potential risks of noise pollution beyond the installation boundary.

Noise Management Plan Review

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. The NMP, dated September 2024, sets out the preventative measures that will be taken at the installation as part of the daily management of noise risk at the site. The NMP has been assessed against the requirements of EPR 6.09 (version 2) Appendix 5 guidance 'Noise Management at Intensive Livestock Installations' and 'Noise and vibration management: environmental permits'.

The NMP provides a suitable procedure in the event of complaints in relation to noise.

The NMP will be reviewed annually or following a substantiated complaint, and any appropriate changes made to the NMP, as identified by the review.

Conclusion

We have assessed the NMP and the H1 risk assessment for noise and conclude that the Applicant has followed the above guidance. We are satisfied that all sources and receptors have been identified, and that the proposed mitigation measures will minimise the risk of noise pollution / nuisance. The operator is required to manage activities in accordance with condition 3.4.1 of the permit and this NMP.

Dust and Bioaerosols

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

There are 2 sensitive receptors within 100m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 12 metres to the north of the installation boundary.

The Applicant has provided a dust and bioaerosol risk assessment.

In addition, guidance on our website concludes that Applicants need to produce and submit a dust and bioaerosol management plan (DBMP) 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 DBMP 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 DBMP, revised version submitted 27/09/2024, sets out the preventative measures that will be taken at the installation as part of the daily management of dust risk at the site.

The Applicant has confirmed measures in their dust and bioaerosol management plan to reduce dust (which will inherently reduce bioaerosols) for potential risks.

The DBMP will be reviewed annually or following a substantiated complaint or any changes to operations.

Dust and Bioaerosol Management Plan Review

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

Standby generator

There is one standby generator which has a net thermal rated input of 0.24MWth, for use in the event of mains power failure. The generator will not be tested more than 52 hours per annum, and will not be used more than 500 hours per annum, averaged over a 3 year period. The generator falls outside of the requirements of the Medium Combustion Plant Directive.

Ranging area

Appropriate measures are in place to protect any surface waters (field ditches/drains etc.) from contamination by poultry manure deposited on the ranging area, including fencing off of the watercourse to the south to provide an appropriate buffer zone.

Appropriate measures are also in place to manage ground around pop-holes, including the use of chalk, and to prevent rain entering the poultry houses, including an overhang to prevent ingress from driving rain, and stepped access to the popholes preventing surface flow from entering the housing.

Groundwater Vulnerability

The site is located within an area of medium to high groundwater vulnerability. The operator has confirmed that the standby generator has a bunded integrated fuel tank and drip tray, and that there is no underground pipework associated with the fuel storage.

Flood risk

The site is located within Flood Zones 2 and 3 (medium/high probability of flooding). The operator has submitted a document, 'Flood risk & drainage assessment report for the proposed free range poultry units on land off Thurlby Rd (B1449)', dated July 2021, providing measures for dealing with surface water run-off to minimise impacts, including measures to minimise potentially polluted flood water running off to clean water drains and measures to protect infrastructure from flooding. The SCR, accident management plan and accident risk assessment have been updated to take into account flood risk and measures to minimise the risk of contamination from the site as a result of a flood event.

Ammonia

There are no Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites located within 5 kilometres of the installation. There are five Sites of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also three Local Wildlife Sites (LWSs), and one Local Nature Reserve (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 (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.

Initial screening using the ammonia screening tool version 4.6, has indicated that emissions from Thurlby Farm will only have a potential impact on SSSIs with a precautionary CL_e of 1µg/m³ if they are within 1,899 metres of the emission source.

Beyond 1,899 m, the PC is less than 0.2µg/m³ (i.e. less than 20% of the precautionary 1µg/m³ CL_e) and therefore beyond this distance the PC is insignificant. In this case, all SSSIs are beyond this distance (see table below) and therefore screen out of any further assessment.

Where the precautionary level of 1µg/m³ is used and the PC is assessed to be less than 20%, the site automatically screens out as insignificant and no further assessment of CL_o is necessary. In this case the 1µg/m³ 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)
Willoughby Meadow	4,395
Hoplunds Wood	4,473
Willoughby Wood	4,986
Claxby Chalk Pit	5,085*
Skendleby Psalter Banks	5,623*

** These sites are included at >5km because the screening is based on an approximate centre point of the emissions and includes a buffer distance calculated from this centre point to the furthest point of the boundary to ensure all nature conservation sites within the threshold distance from the installation boundary have been included in the assessment. In this instance some of the sites may be further than 5km from the installation boundary and should be excluded from assessment, however we have not checked this.

Ammonia assessment – LWS/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 4.6, has indicated that emissions from Thurlby Farm will only have a potential impact on the LWS/LNR sites with a precautionary CLe of $1\mu\text{g}/\text{m}^3$ if they are within 793 metres of the emission source.

Beyond 793m 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/LNRs are beyond this distance (see table below) and therefore screen out of any further assessment.

Table 2 – LWS/LNR Assessment

Name of LWS/LNR	Distance from site (m)
Willoughby Branch Line LNR	1,644
Willoughby Branch Line LWS	1,681
Farlesthorne Pit LWS	1,702
Spendluffe Meadow LWS	2,188*

** These sites are included at >2km because the screening is based on an approximate centre point of the emissions and includes a buffer distance calculated from this centre point to the furthest point of the boundary to ensure all nature conservation sites within the threshold distance from the installation boundary have been included in the assessment. In this instance some of the sites may be further than 2km from the installation boundary and should be excluded from assessment, however we have not checked this.

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. The decision was taken in accordance with our guidance on confidentiality.
Identifying confidential information	We have not identified information provided as part of the application that we consider to be confidential. The decision was taken in accordance with our guidance on confidentiality.
Consultation	
Consultation	The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement. The application was publicised on the GOV.UK website. We consulted the following organisations: <ul style="list-style-type: none"> Local Authority Environmental Health – East Lindsey District Council UK Health Security Agency (UKHSA) Director of Public Health Health and Safety Executive (HSE) 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 and baseline reporting under the Industrial Emissions Directive.
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.

Aspect considered	Decision
	<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> <p>The proposed techniques for priorities for control are in line with the benchmark levels contained in the Sector Guidance Note EPR6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with The Best Available Techniques (BAT) Reference document (BREF) for the Intensive Rearing of Poultry or Pigs (IRPP) published on 21st February 2017.</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 based on BAT have been set for the following substances.</p> <p>Ammonia, Nitrogen and Phosphorus.</p> <p>BAT-AELs have been added in-line with Intensive Farming BAT conclusions document dated 21/02/2017. These limits are included in table S3.3 of the permit.</p>
Monitoring	<p>We have decided that monitoring should be carried out for the parameters listed in the permit, using the methods detailed and to the frequencies specified.</p> <p>These monitoring requirements have been imposed in order to ensure compliance with Intensive Farming BAT conclusions document dated 21/02/2017.</p>

Aspect considered	Decision
Reporting	<p>We have specified reporting in the permit.</p> <p>We made these decisions in order to ensure compliance with Intensive Farming BAT conclusions document dated 21/02/2017.</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 opened on 02/08/2024 and closed on 02/09/2024.

Responses from organisations listed in the consultation section

Response received on 05/08/2024
HSE
Brief summary of issues raised
No comments to make.
Summary of actions taken or show how this has been covered
No further action.

Response received on 22/08/2024
UKHSA
Brief summary of issues raised
Note that the main emissions of potential public health significance are emissions to air of dust, including particulate matter, odour, and ammonia. However satisfied that the control measures proposed by the applicant should ensure that there are no significant impacts on public health. Assume that the installation will comply in all respects with the requirements of the permit, including the application of Best Available Techniques (BAT), which should ensure that emissions present a low risk to human health.
Summary of actions taken or show how this has been covered
No further action.

Response received on 29/08/2024
Director of Public Health
Brief summary of issues raised
Note that the main emissions of potential public health significance include ammonia, bioaerosols and dust, with other potential hazards including litter, noise, and odour. Confirm that appropriate measures are in place to mitigate dust, bioaerosols, odour and noise pollution, appropriate procedures are in place to prevent the onset or spread of zoonotic diseases, and that a climate change adaptation plan is in place to account for changes in surface water flooding and sea level rise. Note that no detail has been provided regarding odour monitoring or the manure management plan. They conclude that there is no major concern regarding risks to the health of the local population from the site.
Summary of actions taken or show how this has been covered

A revised OMP, dated September 2024, was submitted which includes details of odour monitoring at the installation.

Applicants are not required to submit a manure management plan as part of the application supporting documents. The plan will be reviewed as part of future compliance visits.

East Lindsey District Council were also consulted but no comments were received.