

Permitting Decisions - Bespoke Permit

We have decided to grant the permit for West Shaws Piggery operated by Mr Andrew Herbert, Mr Paul Herbert, Mrs Dorothy Herbert and Mr Ian Herbert.

The permit number is EPR/SP3821SZ.

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.

The installation comprises two pig houses, numbered 1 and 2, which both operate a fully slatted floor system, with a shallow pit (slurry depth <800mm). The two pig houses provide a combined capacity for 3,300 production pig (pigs over 30 kg) places. The site operates an all-in-all-out batch system with four batches per year and twelve weeks downtime per annum for cleaning operations.

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 considerations](#) section to show how the main relevant factors have been taken into account
- shows how we have considered the [consultation responses](#)

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

Read the permitting decisions in conjunction with the environmental permit. 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.

All new installation farming permits issued after 21st February 2017 must be compliant in full from the first day of operation.

There are some additional requirements for permit holders. The BAT 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 phosphorus excretion.

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

BAT Conclusions review

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

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their document reference 'Supporting Information- West Shaws' and dated 03/07/2025, 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 3 Nutritional management - Nitrogen excretion

The Applicant has confirmed it will demonstrate that the installation can achieve levels of nitrogen excretion below the required BAT-AEL of 13.0 kg N/animal place/year and will use BAT 3a technique reducing the crude protein content.

BAT 4 Nutritional management - Phosphorus excretion

The Applicant has confirmed it will demonstrate that the installation can achieve levels of phosphorus excretion below the required BAT-AEL of 5.4 kg P₂O₅/animal place/year and will use BAT 4a technique reducing the crude protein content.

BAT 24 Monitoring of emissions and process parameters - Total nitrogen and phosphorus 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 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.

The Applicant has confirmed they will report the ammonia emissions to the Environment Agency annually by utilising estimation by using emission factors.

BAT 26 Monitoring of emissions and process parameters - Odour emissions

Not applicable as no sensitive receptors within 400 metres of the Installation boundary.

BAT 27 Monitoring of emissions and process parameters - Dust emissions

Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT Conclusions.

The Applicant has confirmed they will report the dust emissions to the Environment Agency annually by utilising estimation by 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:

- Pigs over 30 kg (fully slatted floor (FSF), shallow pit): 2.6 kg NH₃/animal place/year.

Detailed assessment of specific BAT measures

Ammonia emission controls – BAT Conclusion 30

A BAT Associated Emission Level (BAT-AEL) provides us with a performance benchmark to determine whether an activity is BAT. The BAT Conclusions include a set of BAT-AELs for ammonia emissions to air from animal housing for pigs.

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.

Detailed assessment of BAT-AELs

Pig housing

The standard emission factor (EF) for fattening pigs (pigs over 30 kg) on FSF (shallow pit) does not meet the relevant BAT-AEL.

Standard EF for fattening pigs on FSF (shallow pit) is 2.813 kg NH₃/animal place/year, BAT-AEL is 2.6 kg NH₃/animal place/year.

The Operator has submitted feed dockets demonstrating average levels of crude protein (CP) are below the assumed CP level:

Assumed CP level for pigs over 30 kg = 18%

Operator average CP level for pigs over 30 kg = 15.1%

$18 - 15.1 = 3\%$ reduction from assumed CP level.

For every 1% reduction from the assumed CP level, we can apply a 10% reduction to the standard EF, up to a maximum of 20%. In this case, a 20% reduction can be applied to the standard EF of 2.813 kg NH₃/animal place/year:

$2.813 - 20\% = 2.25$ kg NH₃/animal place/year which meets the BAT-AEL of 2.6 kg NH₃/animal place/year.

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 West Shaws Piggery dated 10/04/2026, 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 management

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.

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.

There are no relevant receptors within 400 metres of the installation boundary and so an OMP was not required.

Noise management

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.

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”.

Under section 3.4 of the guidance, a Noise Management Plan (NMP) 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 a NMP 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 noise emissions.

There are no relevant receptors within 400 metres of the installation boundary and so a NMP was not required.

Dust and Bioaerosols management

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.

In addition, guidance on our website concludes that Applicants need to produce and submit a dust and bioaerosol management plan beyond the requirement of the initial risk assessment, with their applications only if there are relevant receptors within 100 metres including the farmhouse or farm workers' 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 bioaerosol management plan in this format. The final dust and bioaerosol management plan provided by the applicant and assessed below was received on 05/03/2026.

There are two sensitive receptors within 100m of the installation boundary, the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 94 metres to the southeast of the installation boundary, and approximately 100 metres from the nearest pig house.

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 measures in their dust and bioaerosol management plan to reduce dust (which will inherently reduce bioaerosols) for the following potential risks:

- Feed selection
- Ventilation
- Slurry storage & removal during clean-out
- Housing
- Yard areas
- House cleaning operations
- Pig movements
- Deadstock
- Vehicle movements

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

Standby Generator

The operator has confirmed that they do not have a standby generator at the installation. In the event of a standby generator being required, then the operator has confirmed they will rent a unit and use as a back up only.

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 5 kilometres (km) of the installation boundary. There is one Site of Special Scientific Interest (SSSI) located within 5 km of the installation boundary. There are also three Local Wildlife Sites (LWS) and four Ancient Woodlands (AW) within 2 km of the installation boundary.

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 (dated 27/06/2025) has indicated that emissions from West Shaws Piggery will only have a potential impact on SSSI with a precautionary CL_e of 1 µg/m³ if they are within 1,892 metres of the emission source.

Beyond 1,892m, the PC is less than 0.2 µg/m³ (i.e. less than 20% of the precautionary 1 µg/m³ CL_e) and therefore beyond this distance the PC is insignificant. In this case the SSSI is beyond this distance (see table below) and therefore screens out of any further assessment.

Where the precautionary level of 1 µg/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 1 µg/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) |
|----------------|------------------------|
| Brignall Banks | 3,197 |

No further assessment is required.

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 27/06/2025) has indicated that emissions from West Shaws Piggery will only have a potential impact on the LWS and AW sites with a precautionary CLe of 1 µg/m³ if they are within 767m of the emission source.

Beyond 767m, the PC is less than 1 µg/m³ and therefore beyond this distance the PC is insignificant. In this case the LWS and AW in the table below are beyond this distance and therefore screen out of any further assessment.

Table 2– LWS / AW Assessment

| Site | Distance from site (m) |
|----------------------------------|------------------------|
| Teesbank Woods, Rokeby LWS | 1,228 |
| Rokeby Park and Mortham Wood LWS | 1,406 |
| Whorlton Banks LWS | 2,032* |
| Waterfall Wood AW | 1,136 |
| Tees Bank Plantation AW | 1,389 |
| Whorlton Banks AW | 2,031* |

*This site is 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.

Screening using the ammonia screening tool version 4.6 (dated 27/06/2025) has determined that the PC on the AW for acid deposition from the application site is

under the 100% significance threshold and can be screened out as having no likely significant effect (see table below).

Table 3 – Acid deposition

| Site | Critical load keq/ha/yr * | Predicted PC keq/ha/yr | PC % of critical load |
|--------------------------|---------------------------|------------------------|-----------------------|
| Sally Gill Plantation AW | 1.73 | 1.723 | 99.6 |

* Critical load values taken from APIS website (www.apis.ac.uk) – 27/06/2025

Detailed modelling, reference ‘A Report on the Modelling of the Dispersion and Deposition of Ammonia from the Piggery at West Shaws, Westwick, near Barnard Castle in County Durham’, and dated 30/04/2025 has determined that the PC on the AW for ammonia emissions and nitrogen deposition from the application site are under the 100% significance threshold and can be screened out as having no likely significant effect (See tables below).

Detailed modelling provided by the Applicant has been audited in detail by our Air Quality Modelling and Assessment Unit (AQMAU). Although we do not agree that proposed operations will have a reduced impact when compared to existing operations, we have confidence that we can agree with the report conclusions that proposed operations will have no likely significant effect.

The worst-case modelled process contributions are summarised in the tables below:

Table 4 - Ammonia emissions

| Site | Critical level ammonia µg/m ³ | Predicted PC µg/m ³ | PC % of critical level |
|--------------------------|--|--------------------------------|------------------------|
| Sally Gill Plantation AW | 3* | 1.052 | 35.05 |

** CLe 3 applied as no protected lichen or bryophytes species were found when checking Easimap layer.

Table 5 – Nitrogen deposition

| Site | Critical load kg N/ha/yr* | Predicted PC kg N/ha/yr | PC % of critical load |
|--------------------------|---------------------------|-------------------------|-----------------------|
| Sally Gill Plantation AW | 10 | 8.19 | 81.93 |

* Critical load values taken from APIS website (www.apis.ac.uk) – 27/06/2025

No further assessment is required.

Decision considerations

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

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:

- Local Authority- Environmental Protection Department - Durham County Council
- Health and Safety Executive
- UK Health Security Agency
- Director of Public Health

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'.

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 a plan which we consider to be satisfactory, showing the extent of the site facilities.

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.

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 have assessed the application and its potential to affect sites of nature conservation, landscape, heritage and protected species and habitat designations identified in the nature conservation screening report as part of the permitting process.

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

See Ammonia section in the Key Issues above for more details.

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.

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.

Dust and bioaerosol management

We have reviewed the dust and bioaerosol management plan in accordance with our guidance on emissions management plans for dust.

We consider that the dust and bioaerosol management plan is satisfactory and we approve this plan.

We have approved the dust and bioaerosol management plan as we consider it to be appropriate measures based on 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 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 plan has been incorporated into the operating techniques S1.2.

Emission limits

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

- Ammonia
- Nitrogen
- Phosphorus

BAT-AELs have been added in-line with the Intensive Farming sector BAT Conclusions document dated 21/02/2017. These limits are included in table S3.3 of the permit.

Monitoring

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

We made these decisions in accordance with the Intensive Farming sector BAT Conclusions document dated 21/02/2017.

Based on the information in the application we are satisfied that the Operator's techniques, personnel and equipment have either MCERTS certification or MCERTS accreditation as appropriate.

Reporting

We have specified reporting in the permit, using the methods detailed and to the frequencies specified.

We made these decisions in order to ensure compliance with the Intensive Farming sector BAT Conclusions document dated 21/02/2017.

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 checked our systems to ensure that all relevant convictions have been declared.

No relevant convictions were found.

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 variation.

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.

The consultation commenced on 14/07/2025 and ended on 11/08/2025.

Responses from organisations listed in the consultation section

Response received from: Durham County Council received on 18/07/2025.

Brief summary of issues raised:

Durham County Council have no history of noise or odour complaints in relation to the site, and subsequently there is no record of any enforcement action.

There are no sensitive receptors within 400m, and provided the appropriate conditions are in place with regards to odour and noise, they have no objections.

Summary of actions taken:

Odour and noise have been assessed in-line with our guidance, which is detailed in the Key Issues section of this document. Standard conditions concerning odour and noise have been included in the Permit.

Response received from: UKHSA received on 29/07/2025.

Brief summary of issues raised:

The main emissions of concern are bioaerosols, dust (including particulate matter) and ammonia. In general, sites of this nature are considered low risk to public health provided that they are over 250m from residential receptors. In this case, the farm itself is occupied by the Operator (farmhouse <100m from pig sheds). The application includes the necessary assessments (e.g. odour, noise, bioaerosols). The facility is over 250m from any other receptors. The site is therefore unlikely to be of wider risk to public health.

The application is poorly structured, with key documents difficult to locate. Ammonia modelling does not clearly include emissions from the proposed slurry lagoon and uses emission rates that may require verification. The lagoon is not assessed for odour or bioaerosols despite being within 400 m of receptors, and limited information is provided on slurry transport and controls.

Compliance with permit conditions and BAT is assumed to ensure a low risk to human health.

Summary of actions taken:

The Applicant submitted a fugitive emissions risk assessment (including dust and bioaerosols and ammonia) in-line with guidance. As there are sensitive receptors located within 100m of the installation boundary, the Applicant submitted a revised dust and bioaerosol management plan (DMP) on 05/03/2026, as outlined in the key issues section above, in-line with guidance. The DMP includes both Operator-owned properties as sensitive receptors. Appropriate measures to mitigate the potential risks from emissions have been identified in the plan. The use of Best Available Techniques and good practice will ensure minimisation of emissions. Furthermore, standard conditions concerning fugitive emissions have been included in the permit.

The Applicant was required to submit separate supporting documents, instead of the spreadsheet format during determination.

The slurry lagoon is not considered to be part of the Installation, due to the distance from the Installation, and therefore has not been included in our assessments and did not need to be included in the ammonia modelling. Slurry is stored on site beneath slatted floors and within underground reception tanks linked to each building. Slurry is removed by sealed system from the reception tanks to tanker and exported directly for spreading on Operator owned land, in accordance with a manure management plan, or moved to an off-site slurry lagoon, approximately 1.4km from the Installation.

Detailed modelling provided by the Operator has been audited in detail. Check modelling has been completed using the appropriate emission factors.

Response received from: Health and Safety Executive received on 14/07/2025.

Brief summary of issues raised:

The Health and Safety Executive confirmed they have no comments to make in relation to this application.

Summary of actions taken:

No further action taken.

There were no public responses or responses from any other organisations to this consultation.