

Permitting decisions

Bespoke permit

We have decided to grant the permit for Wellington Farm operated by Allan Panniers, Gill Panniers and Nick Panniers.

The permit number is EPR/WP3237YP.

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 ('IRPP') Best Available Techniques ('BAT') conclusions

The new BAT Reference Document ('BREF') for the IRPP was published on the 21st February 2017. There is now a separate BAT conclusions document which will set out the standards that permitted farms will have to meet.

The BAT conclusions document is as per the following link:

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

Now that 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 are published.

New BAT conclusions review

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

We have sent out a Schedule 5 Notice requiring the Applicant to confirm that the new installation complies in full with all of the BAT conclusion measures.

The Applicant has confirmed their compliance with all BAT conditions for the new installation in their document reference 'Existing Housing and Drainage' received 22/08/17 and in their response to our Schedule 5 Notice dated 15/12/17 on 20/12/17.

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

BAT measure	Applicant compliance measure
BAT 3 – Nutritional management nitrogen excretion	<p>The Applicant has confirmed that they can demonstrate 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.</p> <p>This confirmation is contained in the Applicant's document entitled 'Existing Housing and Drainage' (received on 22/08/17).</p> <p>Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT conclusions.</p>
BAT 4 – Nutritional management phosphorous excretion	<p>The Applicant has confirmed that they can demonstrate levels of phosphorous excretion below the required BAT-AEL of 0.45 kg P₂O₅ animal place/year by an estimation using manure analysis for total phosphorous content.</p> <p>This confirmation is contained in the Applicant's document entitled 'Existing Housing and Drainage' (received on 22/08/17).</p> <p>Table S3.3 of the permit concerning process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT conclusions.</p>
BAT 24 – Monitoring of	Table S3.3 of the permit, concerning process monitoring, requires the Operator

BAT measure	Applicant compliance measure
emissions and process parameter for total nitrogen and phosphorous excretion	<p>to undertake relevant monitoring that complies with these BAT conclusions.</p> <p>The Operator has confirmed in their response on 04/02/18 to our request for information on 30/01/18 that they will monitor total nitrogen and phosphorus excretion by estimation using manure analysis for total nitrogen and total phosphorus content (option 'b' of BAT 24).</p>
BAT 25 – Monitoring of emissions and process parameters for ammonia 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's response on 20/12/17 to our request for information on 15/12/17 confirms that they will estimate using emission factors to monitor ammonia (option 'c' of BAT 25).</p> <p>An Air Impact Assessment has been undertaken ('Pre-application Report' dated 10/08/17) and concluded that the ammonia emissions will not have a significant effect on relevant habitat sites. See further information below.</p>
BAT 26 – Monitoring of emissions and process parameters for odour emissions	<p>The approved odour management plan includes the following measures to periodically monitor odour emissions to air:</p> <p>A person not directly involved with the farm will routinely monitor odour levels from three discrete locations twice per week. Odour levels, on a scale of 1 – 5, will be recorded. In the event that odour is detected at levels 3 or above, the Operator will instigate contingency measures and undertake hourly monitoring until levels return to level 2 or below.</p>
BAT 27 – Monitoring of emissions and process parameters for dust emissions	<p>Table S3.3 process monitoring requires the Operator to undertake relevant monitoring that complies with these BAT conclusions.</p> <p>The Applicant confirmed in their response on 20/12/17 to our request for information on 15/12/17 that they will estimate by using emission factors to monitor dust (option 'b' of BAT 27).</p>
BAT 31 – Ammonia emissions from poultry houses for laying hens	<p>The BAT-AEL to be complied with is 0.13 kg NH₃/animal place/year.</p> <p>The emission factor for free range laying hens in housing with an aviary system is 0.08 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.</p> <p>The Operator has confirmed in their application document entitled 'Existing Housing and Drainage' (received on 22/08/17) that they will meet the BAT-AELs.</p>

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 Wellington Farm (dated 30/08/17, received on 12/12/17) demonstrates that there are no hazards or likely pathways 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 baseline 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:

- production of eggs through the keeping of laying hens;
- storage of raw materials, including feed;
- ventilation from the poultry houses;
- management of poultry litter;

- disposal of carcasses;
- depletion of poultry stock; and
- clean out of poultry sheds.

Odour Management Plan (OMP) review

There are 19 sensitive receptors located within 400 metres of the installation boundary.

The poultry houses are likely to be the main source of odour from the site. Houses 1 and 2 are existing site infrastructure and have gable-end fans. Houses 3 and 4 will be new and have high velocity roof ventilation systems. This will improve the dispersion and dissipation of any odorous emissions to air.

The creation of dust on site will be minimised with the use of sealed feed systems and controls on the moisture content of litter within the poultry houses. Fugitive emissions will be prevented through inspections and maintenance of infrastructure in accordance with the site's Routine Maintenance Schedule. Carcasses will be stored in sealed containers on site and collected between 3 and 5 times per week.

There will be belt removal of litter from the poultry houses twice per week when in use. Litter will be deposited directly into trailers, which will then be covered and removed from the installation for spreading on Operator-controlled land in accordance with a manure management plan. All litter will be removed from the poultry houses and the site within 3 days of stock depletion. There will be no storage of slurry or manure on site.

Drainage from the land immediately adjacent to the pop-holes in the poultry houses may be lightly contaminated due to the presence of the free range hens. This drainage will be intercepted by bark mulch and grassed land. Underground tanks will contain the dirty wash waters arising from cleaning the poultry houses following depletion of the hens. Cleaning will commence within 24 hours of stock depletion.

Bird sickness, which may cause wet litter, is identified in the OMP as a potential abnormal operation. In the event that this occurs, the Operator will top up the bedding with dry litter to reduce the moisture content and contact a veterinarian. Contingency actions for events which may result in the creation of odour are also listed in the Operator's 'Contingency Measures' plan.

The OMP also contains a complaints procedure. Reports of odour, and the circumstances prevailing at the time of the reports, will be recorded by the Operator and actions will be taken to investigate and rectify any issues on site.

The OMP will be reviewed by the Operator annually.

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. 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 as follows:

- ventilation of poultry houses;

- testing of the standby generator;
- maintenance and repairs of equipment;
- deliveries of feed and fuel;
- egg collections;
- delivery and collection of hens; and
- house cleaning operations.

NMP review

We have assessed the NMP and the H1 risk assessment for noise and concluded 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.

Excluding the Operator's premises, there are 19 sensitive receptors within 400 metres of the installation boundary. The installation boundary incorporates a large roaming area for the birds; we consider that the largest source of noise will be from the poultry houses and their immediate surroundings. The ventilation fans on the poultry houses will receive routine preventative maintenance at the end of each crop cycle and any issues identified during the crop will be isolated and repaired.

All activities, other than the collection of hens, will occur during daytime hours only. Receptors are likely to be less sensitive to noise during these hours. Collection of hens will occur during night time hours for bird welfare purposes; however, this will only occur once every 13 months at the end of the crop cycle. The Operator will also implement noise mitigation measures to prevent noise pollution arising from this activity, including the use of screen curtains on collection vehicles and requiring minimal noise from site personnel.

The Operator will assess noise levels from the site daily. A complaints procedure is also in place, which the Operator will implement in the event that noise complaints are received. This procedure will include a review of the conditions occurring at the time of the complaint and actions taken by the Operator in response.

Dust and Bioaerosols

The use of Best Available Techniques and good practice will ensure minimisation of emissions. There are measures included within the permit ('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; in the event that fugitive emissions cause pollution, the Operator will be required to undertake a review of site activities, provide an emissions management plan and undertake any mitigation measures recommended as part of the review once agreed in writing with the Environment Agency.

There are 15 sensitive receptors within 100m of the installation boundary; the nearest sensitive receptor (the nearest point of their assumed property boundary) is approximately 5 metres east of the installation boundary. There are a fewer number of receptors located within 100m of the poultry houses, where the majority of dust is likely to be emitted from.

Guidance on our website concludes that Applicants need to produce and submit a dust and bioaerosol risk assessment with their applications only if there are relevant receptors within 100 metres of their farm (e.g. 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 risk assessment in this format.

The guidance referenced above states that particulate concentrations fall off rapidly with increases in distance from the emitting source. This fact, together with the proposed good management of the installation such as

keeping areas clean from build-up of dust, and other measures in place to reduce dust and risk of spillages all reduce the potential for emissions impacting the nearest receptors. The Applicant has confirmed the following measures in their operating techniques to reduce dust:

- use of sealed feed systems;
- removal of litter into covered trailers; and
- use of high speed roof ventilation on houses 3 and 4.

Conclusion

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

Ammonia

There is one Site of Special Scientific Interest (SSSI) located within 5 km of the installation. There are also 10 Local Wildlife Sites (LWS) and 15 Ancient Woodlands (AW) within 2 km of the installation.

Ammonia assessment – SSSI

The following trigger thresholds have been applied for assessment of SSSIs:

- If the process contribution (PC) is below 20% of the relevant critical level (CLe) or critical load (CLo), the farm can be permitted with no further assessment.
- Where this threshold is exceeded, an assessment alone and in combination is required. An in-combination assessment will be completed to establish the combined PC for all existing farms identified within 5 km of the SSSI.

Initial screening using the ammonia screening tool version 4.5 has indicated that emissions from Wellington Farm will only have a potential impact on the SSSI site with a precautionary critical level of $1\mu\text{g}/\text{m}^3$ if it is within 1,493 metres of the emission source.

Beyond 1,493m the PC is less than $0.2\mu\text{g}/\text{m}^3$ (i.e. less than 20% of the precautionary $1\mu\text{g}/\text{m}^3$ critical level) and therefore beyond 1,493m the PC is insignificant. In this case the SSSI is beyond this distance (see table 1 below) and it therefore screens out of any further assessment.

Where the precautionary level of $1\mu\text{g}/\text{m}^3$ is used, and the process contribution is assessed to be less than 20% the site automatically screens out as insignificant and no further assessment of critical load is necessary. In this case the $1\mu\text{g}/\text{m}^3$ level used has not been confirmed by Natural England, but it is precautionary. It is therefore possible to conclude no likely damage to these sites.

Table 1 – SSSI Assessment

Name of SSSI	Distance from site (m)
Birchend	4,359

Ammonia assessment – LWS/AW

The following trigger thresholds have been applied for the assessment of these sites:

- If the PC is below 100% of the relevant CLe or critical load CLo, the farm can be permitted with no further assessment.

Initial screening using ammonia screening tool version 4.5 has indicated that emissions from Wellington Farm will only have a potential impact on the LWS and AW sites with a precautionary CLe of $1\mu\text{g}/\text{m}^3$ if they are within 603 metres of the emission source.

Beyond 603m the PC is less than 1µg/m³ and therefore beyond this distance the PC is insignificant. In this case all LWSs and AWs are beyond 603m (see table 2 below) and therefore they all screen out of any further assessment.

Table 2 – LWS/AW Assessment

Name of LWS/AW	Distance from site (m)
Ponds at Lower Moorend Farm LWS	2,095
Cheyney Court Wood LWS	2,211
Fields near Evesbatch Coppice LWS	2,419
Fields near The Majors Arms LWS	2,179
Field near Ward Hill LWS	2,078
Cowarne Wood LWS	778
Swill Meadow LWS	1,617
Woodland East of Little Merrifield LWS	2,428
River Frome LWS	1,163
Hopton Dingle LWS	2,214
Ash Bed AW	1,319
Rough Coppice AW	1,479
Unknown AW	1,705
Cockhill Ashbed AW	2,039
Cheyney Court Wood AW	2,208
Bromtrees Coppice AW	1,016
Hill Bank Coppice AW	1,380
Unknown AW	2,323
Lower Coppice AW	2,464
Ash Coppice AW	2,021
Hanging Covert AW	808
Hall Court Coppice AW	618
Unknown AW	2,117
Growland Coppice AW	661
The Ash Bed AW	2,306

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.
Consultation	
Consultation	<p>The consultation requirements were identified in accordance with the Environmental Permitting Regulations and our public participation statement.</p> <p>The application was publicised on the GOV.UK website.</p> <p>We consulted the following organisations:</p> <ul style="list-style-type: none"> • Local Authority – Environmental Health; • Local Authority – Planning; • Public Health England; • Department of Public Health; and • Health and Safety Executive. <p>The comments and our responses to the Local Authority – Environmental Health and Public Health England are summarised in the consultation section.</p> <p>No responses were received from the Local Authority – Planning, the Department of Public Health or the Health and Safety Executive.</p>
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	<p>We considered the extent and nature of the facility at the site in accordance with RGN2 'Understanding the meaning of regulated facility', Appendix 2 of RGN 2 'Defining the scope of the installation' and Appendix 1 of RGN 2 'Interpretation of Schedule 1'.</p> <p>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.</p>
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

Aspect considered	Decision
	Directive.
Biodiversity, heritage, landscape and nature conservation	<p>The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.</p> <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>
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 EPR 6.09 and we consider them to represent appropriate techniques for the facility. The permit conditions ensure compliance with relevant BREFs.</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>
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 technical measures have been set for the following substances:</p> <ul style="list-style-type: none"> • Nitrogen; • Phosphorous; and • Ammonia. <p>These ELVs have been set to implement the BAT-AELs introduced in the BAT conclusions document published on 21/02/17.</p>

Aspect considered	Decision
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 implement the BAT conclusions for the IRPP which were published on 21/02/17.</p> <p>We made these decisions in accordance with the IRRP BREF.</p>
Reporting	<p>We have specified reporting in the permit. Annual reporting of the process monitoring parameters is required to implement the BAT conclusions for the IRPP which were published on 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.

Responses from organisations listed in the consultation section

Response received from
Local Authority, Environmental Health (Herefordshire Council)
Brief summary of issues raised
Herefordshire Council identified the risk of bioaerosols (PM10) from intensive farming installations affecting the health of receptors which are located within 100m of the installation boundary. However, based on their current screening criteria, Herefordshire Council had no adverse comments in regards to the impacts on air quality from this installation.
Summary of actions taken or show how this has been covered
The Operator has submitted a bioaerosols risk assessment with their application which concludes that the risk is insignificant. Condition 3.2.1 of the permit prohibits pollution from emissions of substances not controlled by emission limits and condition 3.2.2 will enable the Environment Agency to require the Operator to submit an emissions management plan in the event that the activity does give rise to dust pollution.

Response received from
Public Health England (PHE)
Brief summary of issues raised
PHE recommended that the Environmental Permit should contain conditions to ensure that fugitive emissions of dust, odour and noise do not impact on public health.
Summary of actions taken or show how this has been covered
<p>The Operator has submitted a bioaerosols risk assessment with their application which concludes that the risk is insignificant. Condition 3.2.1 of the permit prohibits pollution from emissions of substances not controlled by emission limits and condition 3.2.2 will enable the Environment Agency to require the Operator to submit an emissions management plan in the event that the activity does give rise to pollution from fugitive sources.</p> <p>Noise and odour management plans have been submitted by the Operator and approved by the Environment Agency. Conditions 3.4.1 and 3.5.1 of the permit prohibit the activity from giving rise to noise and odour pollution.</p>