
RESPONSE TO REQUEST FOR
FURTHER INFORMATION

IN RELATION TO

APPEAL (APP/W1850/W/17/3170855)

FOR

**THE PROPOSED ERECTION OF
TWO POULTRY BUILDINGS, NEW ACCESS AND
CONVERSION OF BUILDING TO HOUSE BIOMASS
BOILER**

AT

ROGERS FARM, BUSH BANK, HEREFORD

ON BEHALF OF

GT WILLIAMS

JULY 2017

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The information provided in this document is in response to the letter dated 20 June 2017 from David Price, EIA and Land Right Manager (Signed with the authority of the Secretary of State). This letter states that following examination of the Environmental Statement, the Secretary of State, pursuant to Regulation 22 of the 2011 EIA Regulations, that to comply with Schedule 4 of those regulations (information for inclusion in environmental statements) the appellant is required to supply the following further information.

1. UPDATED PROJECT DESCRIPTION

Below is an updated project description.

The proposed development involves the erection of two poultry buildings, four feed bins, new access with 250m track and conversion of an existing farm building to house a biomass boiler at Rogers Farm.

The proposed poultry units will be situated directed south-east of the existing farm buildings in what is currently an arable field. The site slopes down from the north-east and the poultry units will be cut into this slope so that level access can be provided adjacent to the farm yard.

The two poultry units will house a maximum of 82,500 broiler birds in total, split between the two units; this is based on the number of chicks that will be delivered at the start of the cycle.

The poultry units will each measure 97.5m (91.4m bird area) by 18.3m and 2.5m to the eaves and 5.25m to the ridge. Each building includes a control room at its western end. Each unit will be ventilated by 16 ridge fans with 4 gable end fans at the eastern end for use in emergencies or particularly hot weather.

The four feed bins will be located at the front of the units (western end) and will measure 6.6m in height and 2.8m in diameter.

A hardstanding track for maintenance access will be provided around the buildings with a concrete yard provided in front of the buildings to allow for HGV access and turning. The existing farm building to be converted for use for the biomass boiler is located off the concrete yard and in front of the proposed poultry units.

The new vehicle access will be created approximately 250m south of the poultry units directly off the A4110. The access track will allow for two HGV's to pass at its entrance point before turning north and running adjacent to the A4110 and existing hedgerow. The track will be constructed from crushed stone except for the entrance off the A4110 and corner turn which will have a tarmac finish. A section of hedgerow of approximately 40m in length will need to be removed to create the new access.

The proposed drainage arrangements for the development include a suitably sized dirty water tank which will be located underneath the concrete yard. This will collect the dirty water from cleaning the poultry units. A separate surface water drainage system will collect and discharge surface water from the poultry buildings and concrete yard to the water course located north-west of the site.

Attenuation trenches with stone bottoms will run down both sides of each poultry unit. The trenches will direct water to a hydrobrake chamber located at the front of the units before discharging the water into a sealed buried pipe across the applicants land to the watercourse located to the north-west. The route of this pipe will be a minimum of 20m north-east of the well which serves the property Micklegarth. A headwall and concrete spillway will be provided at the discharge point with the watercourse.

The layout of the proposed development is shown on the Block Plan at Appendix 1 and other technical drawings submitted with the application.

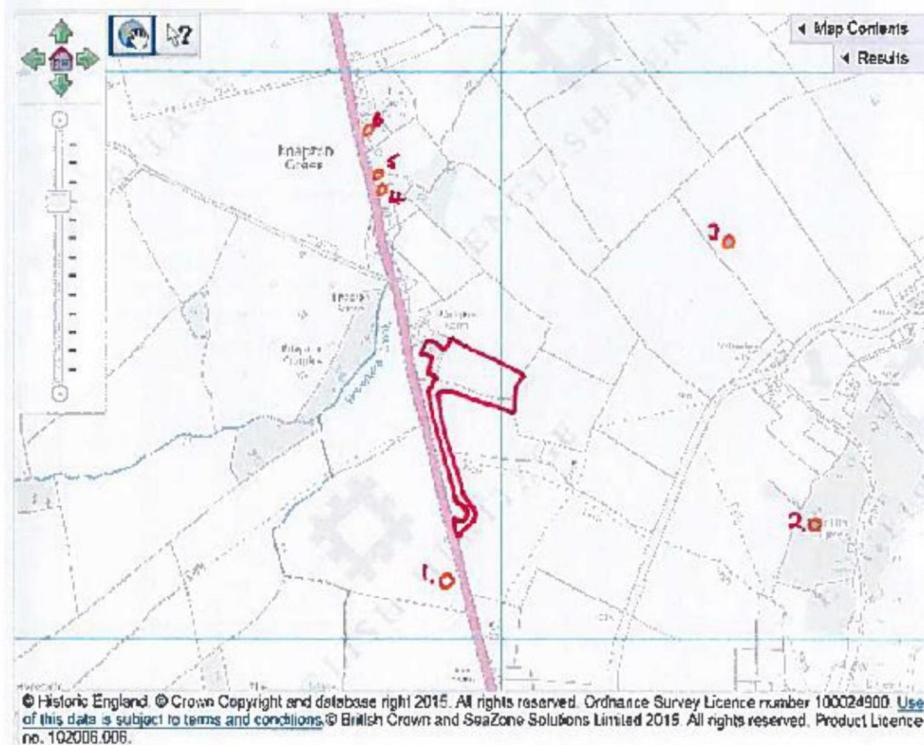
Based on developments of a similar size it is anticipated that the construction period will last approximately 12 weeks.

The following sections describe the production systems, the built development, operation of the site and environmental controls.

2. ARCHAEOLOGICAL POTENTIAL OF THE SITE

The archaeological potential of the site has been assessed by undertaking a review of Herefordshire's Historical Environmental Records and other appropriate records.

A review of the Heritage Gateway website showed that there are no recorded items on the application site or immediately adjacent to it. The plan below shows the nearest Historic Environmental Records to the site.



Legend

▲ Listed Building (NHLE)	■ Scheduled Monument (centre point)
■ EH PastScape	■ Registered Park/Garden (centre point)
○ Local HER record points	■ Registered Battlefield (centre point)
▲ Local HER record polygons	■ Protected Wreck Site (centre point)
○ National Trust HBSMR	■ World Heritage Site
■ Building Preservation Notice	■ Certificate of Immunity
◆ Designation Decision Records De-listed	■ Designation Decision Records Non-designated
● Parks and Gardens (Non Statutory Data)	■ NMR Excavation Index
■ Church Heritage Record (Non Statutory Data)	

A brief description of each of these records is provided below.

1. Site of milestone. Carved stone post by the A4110, erected by the Hereford turnpike trust in the 19th Century. Located approximately 100m south of the proposed new entrance track to the site.
2. Limekiln Grove, Birley with Upper Hill. Woodland area. Tithe map of 1841 calls it Leasow Wood. Located approximately 480m south-east of the site.
3. Cropmarks, Lye Court, Birley. Cropmarks shown on the RAF vertical 1:2,500 AP of the area. They lead downhill towards an orchard. Located approximately 420m north-east of the site.

4. Geindale War Memorial (WW1), Birley. WW1 war memorial. Stone cross in the grounds of St. Peter's Church. Located approximate 195m north of the site.
5. Foxwell Cottage, Birley. Historic Farm recorded as part of the Herefordshire Farmstead characterisation Project. Located approximately 220m north of the site.
6. The Croft Farm, Birley. Historic Farm recorded as part of the Herefordshire Farmstead characterisation Project. Located approximately 385m north of the site.

Based on this desk top research of the Historic Environmental Records there are no recordings of any archaeological features on or near to the site that could be affected by the proposed development or the associated construction works.

3. EXPLANATION OF THE CRITERIAL USED TO DETERMINE THE SIGNIFICANCE OF EFFECTS FOR LANDSCAPE AND VISUAL IMPACTS, ECOLOGY, HISTORIC ENVIRONMENT AND TRANSPORT.

3.1 LANDSCAPE & VISUAL IMPACTS

Degree of Significance of Landscape Effects

GLVIA3 provides the following definition of Significance:

"A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic."

Under the guidance of GLVIA3, the approach taken to combine individual judgements made under the preceding text of contributing criteria is for:

"All the judgements against the individual criteria can be arranged in a table to provide an overall profile of each identified effect. An overview can then be taken of the distribution of the judgements for each criterion to make informed professional assessment of the overall significance of each effect."

Criteria to assess the Level of Significance of Landscape Effects are based on the following scale:

Negligible (Not Significant) - little or no change to landscape; the development does not affect the existing landscape physically, visually and perceptually.

Minor (Not Significant) - overall impact is low; positive and beneficial effects of change outweigh negative and adverse effects; direct and indirect changes as a result of the development are at acceptable manageable level, mitigation measures can eliminate altogether any adverse impact by undertaking design changes.

Moderate (Not Significant) - overall impact has the potential to cause harm to the landscape; secondary effects need to be managed; negative and adverse effects should be reduced and enhanced through an appropriate landscape scheme of mitigation

measures.

Major (Significant) - overall impact is high resulting in major change to the landscape; high risk of irreparable damage and loss of landscape character; negative and adverse effects outweigh any positive and beneficial effects of change; mitigation measures difficult to reduce impact where only remedy may be to compensate and benefits are indirect; some people may take a contrarian view.

Any adverse impacts assessed as Major are considered to be potentially significant to the decision making process.

Degree of Significance of Visual Effects

GLVIA3 provides the following definition of Significance:

“A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic.”

Under the guidance of GLVIA3, the approach taken to combine individual judgements made under the preceding text of contributing criteria is for:

“All the judgements against the individual criteria can be arranged in a table to provide an overall profile of each identified effect. An overview can then be taken of the distribution of the judgements for each criterion to make informed professional assessment of the overall significance of each effect.”

Criteria to assess the Level of Significance of Visual Effects are based on the following scale:

Negligible (Not Significant) - little or no change to visual amenity.

Minor (Not Significant) - overall impact is low; positive and beneficial effects of change outweigh negative and adverse effects; direct and indirect changes as a result of the development are at acceptable manageable level, mitigation measures can eliminate altogether any adverse impact by undertaking design changes.

Moderate (Not Significant) - overall impact has the potential to cause harm to visual amenity at local level; secondary effects need to be managed; negative and adverse effects should be reduced and enhanced through an appropriate landscape scheme of mitigation measures.

Major (Significant) - overall impact is high at regional / district scale resulting in major change to visual amenity; high risk of irreparable damage and significant loss of composition and enjoyment of view; negative and adverse effects outweigh any positive and beneficial effects of change; mitigation measures difficult to reduce impact where only remedy may be to compensate and benefits are indirect; some people may take a contrarian view.

Any adverse impacts assessed as Major are considered to be potentially significant to the decision making process.

3.2 ECOLOGY

Assessment of Ecologically Significant Effects/Impacts

An ecologically significant impact is defined as an impact (negative or positive) on the integrity of a defined site or ecosystem and/or conservation status of habitats or species within a given geographical area. Positive impacts are likely to be rarer, but are possible if ecological enhancements are included within a scheme's design at an early stage in the project.

The integrity of a site is defined as 'the coherence of its ecological structure and function, across its whole area, that enables it to sustain the habitat, complex of habitats and/or the levels of populations of the species for which it was classified'. A site/ecosystem that achieves this level of coherence is considered to be in 'favourable' condition. When considering if sites or ecosystems will be significantly affected or not the overall questions should be

- 1) For designated sites – is the project likely to move the condition of the site towards or away from favourable condition
- 2) For ecosystems – is the project likely to result in a change in ecosystem function that affect its integrity

The concept of conservation status can be used to determine whether an impact on a habitat or species is likely to be ecologically significant. This may be evaluated for any defined study area at any defined level of ecological value. The definition of conservation status for habitats and species used in this assessment is based on the EC Habitat Directive definition. It has been modified so that evaluation of conservation status can be applied to habitats and species within any defined geographical area. Therefore:

- for habitats, conservation status is determined by the sum of influences acting on the habitat and its typical species, that may affect long-term distribution, structure and functions, as well as the long-term survival of its typical species within a given geographical area;
- for species, conservation status is determined by the sum of influences acting on the species concerned that may affect the long-term distribution and abundance of its populations within a given geographical area.

The significance of the impacts of a development is a product of the characteristics of the impact (direct or indirect etc, see above) and the importance of the receptor (in terms of development control, policy guidance and legislation against the level at which it is valued). When evaluating the significance of impacts on sites and ecosystems at sub-national levels

of value, the description of the ecologically important characteristics of the site or ecosystem falls to the ecologists carrying out the assessment.

It is also appropriate to use Biodiversity Action Plan (BAP) guidance, where available, to draw reasonable conservation objectives for those important characteristics. Results from work on levels of ecological value and impact magnitude are both used to assess the significance of ecological impact.

Level of Significance

A level of significance is deduced by making subjective links between receptor value and the characteristics of the impact whilst giving due consideration to relevant planning policies, conservation status, rarity and legal protection in conjunction with professional experience. The following nominal significance levels have been used in the impact assessment to describe the predicted impact upon the receptor in question, based on known ecological principles and systems:

- Very Major (significant at international level)
- Major (significant at national level)
- Moderate (significant at regional or county level)
- Minor (significant at district/local level)
- Very Minor (significant at local/site level)
- Negligible (not significant)

3.3 HISTORIC ENVIRONMENT

The criteria used to assess the significance of effects on heritage assets is set out below.

The purpose of a Historic Environment Assessment is to meet the relevant guidance when considering proposals that have the potential to have some impact on the character or setting of a heritage asset. It is not concerned with other planning issues. Under the requirements of the NPPF and of other useful relevant guidance, such as English Heritage's Conservation Principles and Informed Conservation, it is necessary to assess the significance of the designated and non-designated heritage assets involved, to understand the nature and extent of the proposed development, and then to make an objective judgement on the impact that proposal may have.

The degree of impact a proposed development could have on such assets is variable and can sometimes be positive rather than negative. The wide range of possible impacts can include loss of historic fabric, loss of historic character, damage to historic setting, and damage to significant views.

The assessment considers the level of magnitude of any impact on the character, setting, or significance of designated or non-designated heritage assets.

Setting is a complex issue defined by a number of factors which are set out in The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3, published by Historic England. This document and its guidance on how to assess the impact of a scheme on setting has been taken into account in forming this response.

In summary the significance of the effect of the proposed development on the setting of a heritage asset is assessed on it's;

- 1) Proximity to the asset
- 2) Extent
- 3) Position in relation to landform
- 4) Degree to which location will physically or visually isolate the asset
- 5) Position in relation to key view

A level of significance is deduced by identifying the status of the heritage asset (designated or non-designated) and a subjective consideration of the potential impact of the proposed development on the heritage asset in terms of the character and setting of the asset.

The table below shows the criteria for assessing magnitude of change on historic environment receptors.

Magnitude	Impact
Major	<ul style="list-style-type: none"> Total or substantial loss of the significance of a heritage asset. Substantial harm to a heritage asset's setting such that the significance of the asset would be totally lost or substantially reduced (e.g. the significance of a designated heritage asset would be reduced to such a degree that its designation would be questionable; the significance of an undesignated heritage asset would be reduced to such a degree that its categorisation as a heritage asset would be questionable).
Moderate	<ul style="list-style-type: none"> Partial loss or alteration of the significance of a heritage asset. Considerable harm to a heritage asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost.
Minor	<ul style="list-style-type: none"> Slight loss of the significance of a heritage asset. This can include the removal of fabric that forms part of the heritage asset, but that is not integral to its significance (e.g. the demolition of later extensions/additions of little intrinsic value). Some harm to the heritage asset's setting, but not to the degree that it would materially compromise the significance of the heritage asset. Level of harm perceivable, but insubstantial relative to the overall interest of the heritage asset.
Negligible	<ul style="list-style-type: none"> A very slight change to a heritage asset. This can include a change to a part of a heritage asset that does not materially contribute to its significance. Very minor change to a heritage asset's setting such that there is a slight impact not materially affecting the heritage asset's significance.
No impact	<ul style="list-style-type: none"> No change to a heritage asset or its setting.

The sensitivity of the heritage asset will depend on factors such as the condition of the asset and its perceived heritage value and significance. The sensitivity of the heritage asset receptor is defined by its significance in terms of national, regional or local statutory or non-statutory protection and grading of the asset. The table below sets out the criteria for assessing sensitivity.

Sensitivity	Criteria
Very High	<ul style="list-style-type: none"> World Heritage Sites
High	<ul style="list-style-type: none"> Scheduled Monuments & Areas of Archaeological Importance. Archaeological sites of schedulable quality & significance. Listed buildings (all grades). Registered Historic Parks and Gardens (all grades). Historic Battlefields.
Medium	<ul style="list-style-type: none"> Local Authority designated sites e.g. Conservation Areas and their settings Undesignated sites of demonstrable regional importance
Low	<ul style="list-style-type: none"> Sites with significance to local interest groups. Sites of which the significance is limited by poor preservation and poor survival of contextual associations.

The sensitivity of the receiving environment, together with the magnitude of change, defines the significance of the impact (see table below). Impacts of 'major' or 'moderate' significance are considered to equate to significant impacts highlighted in the context of the EIA Regulations.

SENSITIVITY	Very High	Major	Major	Moderate	Minor
	High	Major	Moderate	Minor	Negligible
	Medium	Moderate	Minor	Negligible	Negligible
	Low	Minor	Negligible	Negligible	Negligible
		Major	Moderate	Minor	Negligible
MAGNITUDE OF CHANGE					

3.4 TRANSPORT

To determine the potential environmental impacts of traffic associated with the proposed development the IEMA Guidelines have been used. The IEMA Guidelines provide two 'rules of thumb' when defining the scale and extent of the assessment of traffic impacts and to determining which traffic links require assessment. The rules are as follows:

- Rule 1: include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)
- Rule 2: include any other specifically sensitive areas where traffic flows have increased by more than 10%

The significance criteria adopted for potential transport and access effects is based on the magnitude (or scale) of the change as well as the sensitivity (or importance) of the receptor affected.

The determination of the sensitivity of individual receptors is based on a number of the above factors such as level or activity and vulnerability of users. Categories of receptor sensitivity have been defined from the principles set out in the IEMA Guidelines and are provided in the table below.

Sensitivity	Receptors
High	Receptors of greatest sensitivity to traffic flows: <ul style="list-style-type: none"> Schools, colleges and other educational institutions; Retirement/care homes for the elderly or infirm; Roads with no footway that may be used by pedestrians; or Accident black spots
Medium	Traffic flows sensitive receptors: <ul style="list-style-type: none"> Hospitals, surgeries and clinics; Parks and recreation areas; Shopping area with roadside frontage; Residential areas; or Roads with narrow footway that may be used by pedestrians
Low	Receptors with some sensitivity to traffic flow: <ul style="list-style-type: none"> Open spaces; Tourist/visitor attractions; Historic buildings; or Churches and other places of worship
Negligible	Receptors with low sensitivity to traffic flows and those sufficiently distance from affected roads and junctions.

The determination of the magnitude of change to traffic effects is described in the table below.

Magnitude	Criteria
Large	Change in total traffic, HGV or hazardous load flows exceeding 90%
Medium	Change in total traffic, HGV or hazardous load flows of 60%-90%
Small	Change in total traffic, HGV or hazardous load flows of 30%-60%
Negligible	Change in total traffic, HGV or hazardous load flows of less than 30%

The significance of impacts identified is determined by considering the perceived sensitivity of the receptor in conjunction with the predicted magnitude effect, as shown in the table below. Impacts of 'major' or 'moderate' significance are considered to equate to significant impacts highlighted in the context of the EIA Regulations.

MAGNITUDE OF EFFECT	SENSITIVITY OF RECEPTOR			
	High	Medium	Low	Negligible
Large	Major	Moderate to Major	Minor to Moderate	Negligible
Medium	Moderate to Major	Moderate	Minor	Negligible
Small	Minor to Moderate	Minor	Negligible to Minor	Negligible
Negligible	Negligible	Negligible	Negligible	Negligible

CONSTRUCTION TRAFFIC MOVEMENTS

The table below shows the anticipated construction traffic movements associated with the appeal proposals at Rogers Farm. These vehicle movements have been based on a similar size scheme for two poultry units and associated development on Land at Dodleston Hall Farm, Kinnerton Road, Dodleston, Cheshire. CH4 9LP. This proposal was subject to an appeal which was allowed.

Activity	Estimated No. of Vehicle Movements
Delivery of Stone	146
Delivery of Concrete	40
Delivery of Steel Sheeting	15
Employees	Approximately 8 per day

It is considered that construction traffic of this nature and scale can be safely accommodated on the local highway network. Should the appeal be allowed it is expected that a condition would be attached requiring the submission of a Construction Method Statement for approval by Herefordshire Council.

The construction phase is anticipated to occur over a 3-month period. Construction phase activity will be limited to the hours of 07.30 – 18.30 Monday to Friday and 08.00 – 13.00 on Saturday to avoid causing disruption to local residents. No construction will take place on a Sunday or Bank Holiday unless absolutely.

In view of this additional information the Air Quality Screening Assessment by SLR dated February 2017 has been updated to assess the above construction traffic movements. The updated report dated June 2017 shows the updated text in red. In summary, the consideration of the above construction traffic movements does not alter the conclusion in the Air Quality Assessment Report;

Therefore, in accordance with the criterion presented within EPUK and IAQM guidance, additional road vehicle trips during the construction phase of the scheme 'can be considered to have insignificant effects' on air quality.

A copy of the updated Air Quality Assessment Report by SLR dated June 2017 is herewith submitted.

In addition, NVC Ltd have prepared an addendum noise impact assessment dated 29th June 2017 which considers noise from the anticipated construction road traffic movements detailed above and construction impacts in respect of the appeal proposal from Rogers Farm. The results show no exceedance of the threshold value and therefore no significant impact would occur.

A copy of the Addendum Noise Impact Assessment dated 29th June is herewith submitted.

3.5 AIR QUALITY SCREENING ASSESSMENT THRESHOLDS

The thresholds used in the Air Quality Screening Assessment are derived from the following sources:

Construction dust assessment: Institute of Air Quality Management (IAQM) 'Guidance on the assessment of dust from construction and demolition'. (v1.1 2016)

Biomass boiler screening: Local Air Quality Management Technical Guidance LAQM.TG(16)

Vehicular pollutants assessment: Local Air Quality Management Technical Guidance LAQM.TG(16)

DMRB Volume 11, Section 3, Part 1 HA207/07- Air Quality (an Interim Advice Note)
Environmental Protection UK (EPUK) and IAQM 'Land-use planning and development control, planning for air quality' (v1.2 2017)

Operational phase dust: Local Air Quality Management Technical Guidance LAQM.TG(16)

How to comply with your environmental permit for intensive farming, Appendix 11 –
Assessing dust control measures on intensive poultry installations, Environment Agency,
Version 1, 2011

4 AIR QUALITY SCREENING ASSESSMENT - EFFECTS ON NON-ROAD MOBILE MACHINERY

The Air Quality Screening Assessment by SLR dated February 2017 submitted with the appeal did not include a qualitative assessment of the effects of non-road mobile machinery (MRMM). As such the Air Quality Screening Assessment has been updated to include such an assessment.

The updated report dated June 2017 highlights the additional comments in red. A copy of the report is herewith submitted.

In respect of effects from NRMM the report concludes;

Notwithstanding, given the short-term duration of construction phase activity and the proximity of relevant receptor locations to the proposed development site boundary, potential impacts on air quality from NRMM emissions are considered to be 'not significant'.

5 CUMULATIVE IMPACTS ASSESSMENT

The cumulative impact assessment only considered the effects from the approved egg laying barns which are on the opposite side of the A4110 to Rogers Farm. The cumulative assessment of this site was done at the request of Herefordshire Council. However, at this time a review of the Council's website for planning applications was undertaken. No applications (approved or under consideration) for proposals of a similar nature or which could be considered to potentially result in cumulative impacts were found. The Parishes of Birley with Upper Hill, Dilwyn, Canon Pyon and Kings Pyon were reviewed which covers an area in excess of 2,000m from the appeal site.

A similar review of planning applications within the same Parishes was undertaken on 3rd July 2017 and no applications of a similar nature to the appeal proposal or which could be considered to potentially result in cumulative impacts were found.

6 CUMULATIVE EFFECTS OF TRANSPORT NOISE

The assessment of cumulative effects from the egg laying barns and the appeal site has not been assessed in relation to transport noise. As such NVC Ltd have prepared an addendum noise impact assessment dated 29th June 2017 which considers;

- Clarification of construction road traffic movements and construction impacts in respect of the appeal proposal from Rogers Farm.
- Justification for not assessing the cumulative effects of transport noise from the egg laying poultry site.

A copy of this addendum noise assessment is submitted.

In respect of construction noise the addendum noise report concludes;

The results show no exceedance of the threshold value and therefore no significant impact would occur.

For the cumulative effects of transport noise from the egg laying site and Rogers Farm the report concludes;

The results of the analysis shows no change in the noise generated by the Garnstone Farm HGVs as a result of the Rogers Farm development HGVs. There is also no change in typical residual sound levels as a result of any cumulative effect of both development vehicle movements.

We therefore conclude that the issue of construction road traffic impacts or cumulative effects of HGVs from both poultry unit developments in the area would not present any significant impacts and its effect would be negligible.

7 LANDSCAPE MANAGEMENT PLAN

A copy of the Landscape Management Plan referred to in Appendix 4 of the Environmental Statement is attached.

8 AIR QUALITY SCREENING ASSESSMENT TABLE 8.2

The mitigation measures referred to in Chapter 10 (para 10.3) of the Environmental Statement relate to the various management plans which form part of the information submitted for the Environmental Permit. The management plans include plans on odour and amenity.

These management plans incorporate 'Best Available Technics', which are required by the Environment Agency and are designed to ensure that practical measures are adopted during the day-to-day management and operation of the site. These measure will help to prevent and/or mitigate incidents of nuisance and/or environmental impacts.

The mitigation measure listed in Table 8.2 of the Air Quality Assessment repeat and complement the measures states in the various management plans referred to above.

9 ODOUR MODELLING

I can confirming that the odour modelling undertaken by AS Modelling & Data Ltd. to inform the odour assessment reports submitted with the Environmental Statement and application included the following measures being taken into account.

- The internal concentrations used in the model assume leak-proof drinkers, dry litter 25-35% moisture content and ventilation is industry standard for modern houses.
- Staged protein reduction and top up litter, as required, is standard practice.
- Doors are closed, apart from when absolutely necessary and that ventilation via stacks is maintained during clear-out.
- Ventilation is increased when doors are necessarily open to prevent as much fugitive emission as possible.

10 NON-TECHNICAL SUMMARY

The non-technical summary has been updated to incorporate the additional information detailed above and a copy is herewith submitted as a separate document.