

Natural Resources Wales permitting decisions

Argoed Poultry Unit

Contents

Substantial Variation	4
The variation number is: EPR/AB3694HZ/V002	4
The operator is: Mr Roger Hughes	4
The Installation is located at: Argoed Poultry Unit, Argoed, Trefeglwys, Caersws, Powys, SY17 5QT	4
Purpose of this document	4
1. Receipt of application	5
1.1 Confidential information	5
2. Consultation.....	5
2.1 Draft Permit Consultation.....	6
3. Requests for further information	6
4. The facility	7
5. Proposed Changes	8
6. Legislation	8
7. The site	9
7.1 Site condition report	9
8. Biodiversity, Heritage, Landscape and Nature Conservation.....	10
9. Environmental Risk Assessment	10
9.1 Air.....	10
9.2 Water	12
9.3 Odour	13
9.4 Noise	18
9.5 Fugitive emissions.....	19
10. Monitoring	20
11. Reporting	20
12. Operating techniques.....	21
13. The permit conditions	21
13.1 Incorporating the application	21
13.2 Environment management system	21
ANNEX 1: Consultation Responses.....	22
1) Consultation Responses from Statutory and Non-Statutory Bodies.....	22
2) Consultation Responses from Members of the Public and Community Organisations.....	22
a) Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils	22
b) Representations from Community and Other Organisations.....	22

c)	Representations from Individual Members of the Public	22
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Substantial Variation

The variation number is: EPR/AB3694HZ/V002

The operator is: Mr Roger Hughes

The Installation is located at: Argoed Poultry Unit, Argoed, Trefeglwys, Caersws, Powys, SY17 5QT

We have decided to issue the variation for Argoed Poultry Unit operated by Mr Roger Hughes.

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:

- explains how the application has been determined
- provides a record of the decision-making process
- shows how all relevant factors have been taken into account

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

1. Receipt of application

The application was received on 24/02/2021 and was duly made as of 07/10/2021 following the receipt of additional information (see section 3 for more information). This means we considered it was in the correct form and contained sufficient information for us to begin our determination, but not that it necessarily contained all the information we would need to complete the determination.

1.1 Confidential information

No claim for commercial or industrial confidentiality has been made. We have not received information in relation to the application that appears to be confidential in relation to any party.

2. Consultation

The consultation requirements were identified and implemented. The decision was taken in accordance with RGN 6 High Profile Sites, our Public Participation Statement and our Working Together Agreements.

A copy of the application and all other documents relevant to our determination (see below) are available for the public to view. Anyone wishing to see these documents could arrange for copies to be made.

We sent copies of the Application to the following bodies, which includes those with whom we have “Working Together Agreements”:

- Food Standards Agency
- Health and Safety Executive
- Public Health Wales
- Powys County Council - Planning Department
- Powys County Council - Environmental Health

These are bodies whose expertise, democratic accountability and/or local knowledge make it appropriate for us to seek their views directly.

The consultation started on **14/10/2021** and ended on **11/11/2021**. An advert was also placed on our website.

No responses were received.

2.1 Draft Permit Consultation

We carried out a consultation on our draft decision. This consultation began on **03/08/2022** and ended on **01/09/2022**.

3. Requests for further information

In order for us to be able to consider the application duly made, we needed more information. We requested the following:

- Confirmation on the Directly Associated Activities following the variation
- Site Plan outlining the new site boundary in green with all emission points. A satisfactory site plan was provided on 07/10/2021.
- A copy of the Manure Management Plan as mentioned in other supporting information provided with the application
- Clarification regarding the approach to the Ammonia Assessment was requested
- Modelling files to support the Ammonia Assessment

This information was provided via email on 06/10/2021 and 07/10/2021. Upon receipt of this information we were able to consider the application Duly Made.

During determination an informal request was also made for clarification on the drainage arrangement on site. This was provided via email on 16/11/2021. Additionally, a revised Site Condition Report was requested (see section 7 for more information). This was provided on 06/12/2021.

Further information was also requested by way of a Schedule 5 Notice relating to the odour modelling. The Schedule 5 Notice was sent on 24/01/2022 with an initial response date of 07/02/2022. This was subsequently extended to 08/06/2022. The applicant responded to the Schedule 5 Notice on 03/02/2022, but this was not considered to address the information requested. The Schedule 5 Notice was re-

issued on 14/02/2022 with a deadline of 14/03/2022. Following further discussions with the applicant, additional information which satisfied the requirements of the Schedule 5 Notice was received on 08/06/2022 (see section 9.3 for more information).

A copy of the information notice and e-mails requesting further information were placed on our public register as were the responses when received.

4. The facility

The regulated facility is an installation which comprises the following activity listed in Part 2 of Schedule 1 to the Environmental Permitting Regulations and the following directly associated activities:

- Section 6.9 A(1)(a) - Rearing of poultry or pigs intensively in an installation with more than 40,000 places for poultry.

As part of this variation, the limit of this activity has changed whereby the maximum number of birds has increased from 64,000 to 220,000, and the bird type is changing from free range egg layers to broilers.

An installation may also comprise 'directly associated activities', which at this installation includes:

- Dirty Water Tanks
- Fuel Tank
- Standby Generator
- Feed Bins
- Carcass Bins
- Gas Tank

Note that as part of the this variation, 'Feed Bins', 'Carcass Bins' and 'Gas Tank' have been added to the permit's directly associated activities.

5. Proposed Changes

The existing permit is for a maximum of 64,000 free range egg laying birds across two sheds. However, in practice the site has only been operating at 32,000 free range laying birds in one shed.

This variation is a change the site's activity from free range laying birds to broilers and an increase in the number of birds permitted to 220,000. To facilitate this change, it is proposed that the existing shed is repurposed into a broiler shed and 3 new broiler shed are constructed.

6. Legislation

The variation will be issued under Regulation 20 of the EPR. The Environmental Permitting regime is a legal vehicle which delivers most of the relevant legal requirements for activities falling within its scope. In particular, the regulated facility is:

- an installation as described by the IED;
- subject to aspects of the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016 which also have to be addressed.

We address the legal requirements directly where relevant in the body of this document. NRW is satisfied that this decision is consistent with its general purpose of pursuing the sustainable management of natural resources (SMNR) in relation to Wales, and applying the principles of SMNR. In particular, NRW acknowledges that it is a principle of sustainable management to take action to prevent significant damage to ecosystems. We consider that, in issuing the Permit a high level of protection will be delivered for the environment and human health through the operation of the Installation in accordance with the permit conditions.

Environment Wales Act 2016 – Biodiversity and resilience of ecosystems duty

Section 6 of the Environment Wales Act 2016 requires that we seek to maintain and enhance biodiversity in the exercise of our functions, and in so doing promote the resilience of ecosystems, in a manner that is consistent with the proper exercise of our functions. NRW is satisfied that in this case we have taken into account and had due

regard to this duty in so far as it is consistent with the function of determining an application for an EPR permit.

7. The site

The proposed activity is located at Argoed Farm, which is positioned approximately 700 metres to the south east of the B4569 highway running between Trefeglwys which is 1.3 miles by road to the south west of the site, and Caersws which is 3 miles to the east.

The site is to be excavated and terraced to accommodate the new buildings within the steeply sloped landscape. The southern-most new shed is to be built at the level of the existing shed. The second and third new sheds are to be elevated by around 3m above the existing shed.

The applicant originally applied to reduce the installation site boundary but a partial surrender application and associated supporting information was not submitted. It was therefore agreed that the original site boundary will remain as is following this variation.

The operator has provided an updated plan to show the location of the sheds which will be included on the permit.

7.1 Site condition report

The Site Condition Report originally submitted with the application did not have all the required sections completed. A full and complete report was received on 06/12/2022.

The new poultry sheds will be constructed on what is currently grassland grazed by livestock and cut for hay/silage. There are no noted pollution incidents or historical land uses known which may have affected this land previously.

We consider that the description provided is satisfactory. The decision was taken in accordance with our guidance on site condition reports – guidance and templates (H5).

8. Biodiversity, Heritage, Landscape and Nature Conservation

The application is within the relevant distance criteria of a site of heritage, landscape or nature conservation, and/or protected species or habitat.

The following screening distances have been used:

- 5 km from the installation for SAC, SPA, RAMSAR sites
- 2 km from the installation for SSSI, NNRs, LNRs, Ancient Woodland sites

These distances are in line with the guidance at the time the applicant submitted the application.

No Special Areas of Conservation (SAC), Special Protected Areas (SPA), RAMSARs, Sites of Scientific Interest (SSSI), National Nature Reserves (NNR) or Local Nature Reserves (LNR) were identified.

Numerous Ancient Woodland (AW) sites were identified. A full assessment of the application and the potential of the proposal to affect these sites identified has been carried out as part of the permitting process. Please see section 9.1 for more information.

9. Environmental Risk Assessment

9.1 Air

The applicant has provided dispersion modelling (using BREEZE AERMOD) which assesses the impact of Ammonia emissions from the proposal on sensitive AW sites. Ammonia emissions may cause damage to the sites via increased atmospheric concentrations, increased Nitrogen deposition and acidification.

The following Scenarios were modelled:

- Scenario 1: Existing scenario (32,000 free range layers)
- Scenario 2: The proposed scenario (220,000 broilers)

Emission rates for the existing scenario have been based on an emission factor of 0.29 kgNH₃/bird/year where the manure collects within the housing. For the ranging

area emissions, emissions have been modelled using 20% which represents the droppings deposited in the range areas. For the proposed scenario, emission rates have been based on an emission factor of 0.034 kgNH₃/bird/year. NRW are in agreement with this approach.

Critical Levels and Critical Loads have been used as a benchmark for assessing the risk of air pollution impacts.

Critical Level

The modelling assessed the predicted Ammonia emissions from the activity against a critical level of 3.0 µg/m³ in line with NRW ammonia sensitivity maps.

For the proposed scenario, out of the numerous ancient woodland sites identified, the highest Process Contribution (PC) of Ammonia was 2.93 µg/m³ at the site adjacent to the proposal (receptor “ER28 – 398”). This represents 97.8% of the critical level. In line with the guidance at the time the application was submitted, as this is less than 100% of the critical level, the emissions can be screened out as insignificant. Furthermore, the proposed scenario represented a betterment when compared to the existing scenario where the PC at the same receptor was 426%.

NRW’s Air Quality Modelling and Assessment Team (AQRMAT) audited the modelling and highlighted that check modelling (using alternative metrological data) suggested a PC at “ER28-398” for the proposed scenario which exceeded the 100% threshold for significance (118%). However, the results still indicated a betterment when compared to the existing scenario.

Critical Load

AW sites do not have a site specific critical load. For the purposes of this assessment, the modelling assessed the predicted deposition from Ammonia against a critical load of 10-20 kgN/ha/yr which is consistent for the critical load values used for Broadleaved, Mixed and Yew Woodlands. NRW are in agreement with this approach.

For the proposed scenario, out of the numerous ancient woodland sites identified, the highest PC of Nitrogen deposition was 0.384 kgN/ha/yr at the site adjacent to the

proposal (receptor “ER28 – 398”). This represents 228.8% of the lower critical level (10 kgN/ha/yr). In line with the guidance at the time the application was submitted, as this is more than 100% of the critical level, the emissions could be considered significant. However, the proposed scenario represented a betterment when compared to the existing scenario where the PC at the same receptor was 997.7% of the lower critical load.

Acidification

This impact pathway has not been assessed directly in the modelling providing due to the calculations of the atmospheric Ammonia (critical level) and nutrient Nitrogen (critical load) forming a more stringent test. As tests for these proved the impact to represent a betterment, the same can be assumed for impacts from acidification.

As detailed above, the proposal will result in an improvement in air quality at the identified AW sites. Despite the number of birds increasing, the betterment has been achieved by changing the operation from free range laying to broiler rearing.

9.2 Water

Un-contaminated water from the poultry unit roofs will be collected via a combination of rainwater harvesting tanks and stone filled filter drains. Land drainage ditches will direct water to an existing ditch which will then take water to a newly proposed attenuation pond which will discharge via gravity into an un-named tributary of the Afon Trannon. Following development, un-contaminated water will broadly follow the same flow path as currently experienced at the site.

Diverter valves will be used for yard areas where during times of wash down to divert contaminated water to underground effluent tanks. Contaminated water from wash down in the poultry units will also be directed and stored in 2 40m³ tanks underground effluent tanks. Waste water from these tanks will be transferred into the on-site Aerobic Digester (at which there is a 140m³ liquid feed tank).

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent pollution of ground and surface water.

9.3 Odour

The Environment Agency's H4 Odour Management guidance is widely accepted and used in regulatory odour impact assessments. NRW has adopted this guidance. As set out in the guidance, the modelling method commonly used in the UK calculates a 98th percentile of hourly average odour concentrations over a year. The results are expressed as odour units.

Potentially unacceptable levels of odour pollution can be identified by comparing the modelled odour units against the benchmarks set out in the guidance. The exposure benchmarks are:

- 1.5 odour units for most offensive odours;
- 3 odour units for moderately offensive odours;
- 6 odour units for less offensive odours.

Odours from poultry rearing are usually placed in the “moderately offensive” category. Therefore, the benchmark of 3 OU_E/m³ has been used to assess the potential impact of odour on nearby sensitive receptors for this application.

The applicant submitted an Odour Air Dispersion Modelling report that used ADMS 5 software. The following Scenarios were modelled:

- Scenario 1: Existing scenario (32,000 free range layers)
- Scenario 2: The proposed scenario (220,000 broilers)

For the purposes of this assessment, results from Scenario 2: The proposed scenario will be discussed.

The proposed scenario's emission rates were originally calculated from an internal concentration of odour which the applicant stated was taken from published values which indicate a likely range for a well-run modern farm of 300ouE/m³ – 2300ouE/m³ across a 36 day growth cycle. However, following the initial audit of the modelling, NRW's Air Quality and Modelling Assessment Team (AQRMAT) queried the emission rates

used as they do not correspond with emission factors listed in Hayes¹. NRW consider the emission factors listed in Hayes to be suitably conservative values representing a worst case scenario. As detailed in section 3, a Schedule 5 Notice was sent the applicant asking for the emission rates used in the proposed scenario to either be further justified or for the modelling to be redone using Hayes emission factors. The applicant provided an updated assessment, which included a sensitivity analysis between the results from the emission rates originally used and those based on Hayes. Results from the proposed scenario using the Hayes emissions factors are discussed below.

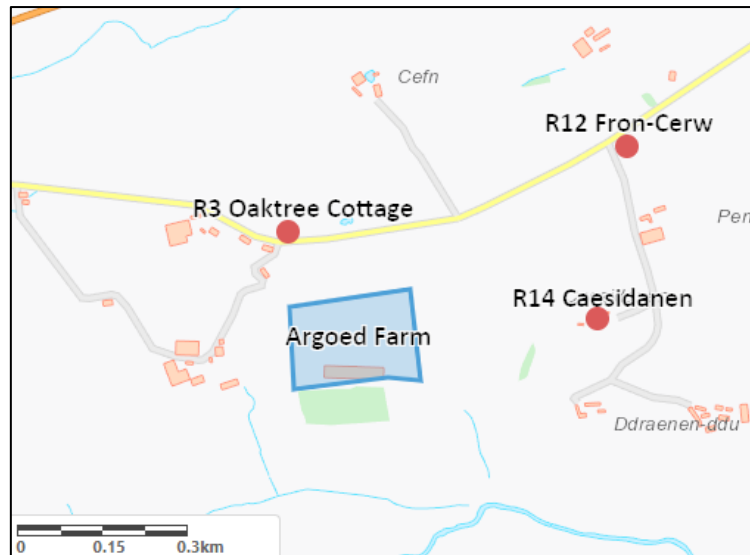
The updated modelling concluded that out of the 17 odour receptors identified, the average 5-year odour impacts as a result of the proposed variation were above a maximum annual 98th percentile hourly mean odour concentration of 3 ouE/m³ for 3 receptors. 2 of these are considered not sensitive due to being associated with the farm on which the poultry unit is located. Receptor 'D14 Caesidanen' located 450m to the east of the farm however, is residential and not associated with the farm. This was predicted to have a 5 year average odour impact of 3.4 ouE/m³.

The results from the updated modelling are based on a 5 year average and not individual metrological years and so might not present the maximum impact. Additionally, the applicant used Global Forecast System metreological data which may not be robust enough for impact assessments.

NRW's AQRMAT completed check modelling using revised metrological data (Met Office high resolution Numerical Weather Prediction Unified Model data for 2017-2021) to look at the maximum impact for individual metrological years. This identified that as well as an exceedance of the 3 ouE/m³ benchmark at receptor D14 Caesidanen', exceedances were also predicted at 'R3 Oaktree Cottage' (4 ouE/m³ in 2019) and 'R12 Fron-Cerw' (3.5 ouE/m³ in 2019).

The location of these receptors in relation to the new sheds is shown below:

¹Odour and ammonia emissions from intensive poultry units in Ireland - Hayes, E. T.; Curran, Thomas P.; Dodd, V. A, 2006



The Environment Agency's H4 Odour Management Guidance explains there is a series of decisions involved in assessing the impact of odour which are: Is there serious pollution? And, Is the operator taking appropriate measures?

It is acknowledged that 'There is no single method of reliably measuring or assessing odour pollution and any conclusion is best based on a number of pieces of evidence. Whether or not odour emissions amount to serious pollution depends on a number of factors.' The FIDOR acronym is a useful tool describing the factors that will determine the degree of odour pollution:

- Frequency of detection
- Intensity as perceived
- Duration of exposure
- Offensiveness
- Receptor sensitivity

When considering the **frequency** of the results discussed above, the modelling reports results as 98th percentile hourly mean which is the hourly mean odour concentration that is equalled or exceeded for 2% over the year. Therefore predicted exceedances of the benchmark discussed above are likely for only 2% of the year. The maximum odour emissions are expected to be during the when the houses are cleared out at the end of each crop cycle, which will occur only approximately 7 times per year. It is anticipated that the maximum odour emissions will be on the first day of clear out and

so the **duration** of the maximum odour impact is anticipated to be short (i.e. few hours within working hours).

As discussed the **intensity** of the odour is predicted to be above the benchmark for moderately offensive odours at potentially 3 receptors. When considering intensity of anticipated odours, **receptor sensitivity** can also be taken into account. In this case it can be assumed the 3 receptors are domestic and may be sensitive to odour from the facility. However, it can be noted these receptors are located within a rural setting and as such may be more tolerable of odours at high intensities within the context of the location. There has been no complaints of odour as a result of the existing installation.

The degree of pollution increases with the size of the exposed population. Therefore, the more people that are affected the greater will be the justifiable expenditure on control measures. However, in this case, only small number of individuals may be affected which represents a relatively small proportion of the population exposed.

Due to the factors considered above it has been decided it is unlikely that serious pollution would be caused due to unreasonable odour as a result of this variation, particularly when considering the measures discussed below to control odour at the site.

EPR 6.09 'how to comply with your environmental permit for intensive farming' – Appendix 4 – 'odour management' notes how preventing odour is rarely possible due to the inherently odorous nature of animals but there is a need to minimise odour and prevent it reaching neighbours.

As there are receptors within 400 metres of the installation, the applicant has detailed the methods by which the site operator will systematically assess, reduce and prevent potentially odorous emissions in an odour management plan.

The plan has identified the following potential sources of odour:

- Accumulation of bird waste in bedding material

- Operational factors that are reported to influence the emission of odours from poultry production sheds include litter moisture content, pH, temperature, bird activity, litter properties, weather conditions, ventilation rate, air speed, manure quantity and diet.
- Carcass storage and disposal and:
- Housekeeping, in particular dust accumulation.

The odour plan details various measures to minimise and mitigate odour issues including:

- No on-site milling of feed and careful selection of feed (supplied from UKASTA accredited feed mill and reducing protein during the crop cycle)
- Feed delivery systems to be sealed and to be carefully managed and monitored to avoid spills. Feed bins to be checked frequently to check for damage or leaks. If a feed bin is found to be damaged, that feed bin will cease to be used immediately.
- Ventilation systems to be regularly adjusted according to the ages and requirements of the flock
- Litter quality controlled with use of feed, ventilation, use of nipple drinking systems to minimise spillage and insulated walls and ceilings to prevent condensation
- Carcasses to be placed in sealed containers immediately after they are removed. Regular collection on a weekly basis with increased collection frequency over the summer.
- House clean out is to be started within one day of destocking where possible and ventilation to be reduced whilst it is taken place
- No storage of litter outside the houses at any time on site and is to be transported off site in covered trailers
- Dirty water to be stored in sealed underground tanks

We have compared the measures proposed to minimise odour at for the site to the BAT standards in EPR 6.09 'how to comply with your environmental permit for intensive farming' and are satisfied that the techniques represent appropriate measures for the installation following this variation. The odour management plan will be incorporated into the operating techniques section of the permit.

Permit condition 3.3.1 requires that emissions from the activities are free from odour at levels likely to cause pollution outside the site. We are satisfied that this condition

will be sufficiently protective in conjunction with the measures described by the applicant for minimising odour production at the installation.

9.4 Noise

A Noise Impact Assessment was provided to assess the impact the variation will have on noise pollution. The assessment was used principles outlined in BS 4142: 2014 and compared baseline noise levels (i.e. the existing unit with 32,000 layers) with modelled noise levels (using IMMI noise mapping software) of the proposed new activities (4 sheds with 220,000 broilers). The assessment concluded that the proposed variation will not result in any noise-related issues. NRW are in agreement with this conclusion.

As there are receptors within 400 metres of the installation, the applicant has submitted a Noise Management Plan (NMP) for the installation as required by EPR 6.09 “How to Comply with your Permit for Intensive Farming”. The noise management plan identifies potential risks from the operation and describes the measures and controls in that will be put place to minimise noise and vibration.

The plan identifies the following sources of noise as a result of the proposal:

- Ventilation Fans;
- Fuel and Feed Deliveries;
- Feeding Systems;
- Alarm Systems;
- Bird Catching;
- Clean Out Operations;
- Maintenance and Repairs;
- Set up and Placement; and
- Standby Generator Testing

The noise management plan details various measures to mitigate noise issues including:

- Fans to be audibly assessed during daily inspections and be regularly maintained
- Lorry’s delivering feed or fuel will obey speed restrictions, be fitted with silencers and switch engines off when not in use

- Alarm systems will be timed to normal working hours to avoid disturbance
- Set up and placement of birds to be carried out during normal working hours
- Litter removal and wash down to take place during normal working hours. Modern low noise pumps requested for wash down and pumps to be used within buildings (within concrete apron)
- Standby Generators to be fully noise insulated and tested during normal working hours

We have compared the measures proposed to minimise noise at the site to the BAT standards in EPR 6.09 'how to comply with your environmental permit for intensive farming' and are satisfied that the techniques represent appropriate measures for the installation. The noise management plan has been incorporated into the operating techniques section of the permit.

We are satisfied that vibration is unlikely to be an issue at the installation. The nature of the intensive farming operation means that there are no significant sources of vibration on site, therefore vibration is not required to be considered in the noise management plan.

Permit condition 3.4.1 requires that emissions from the activities are free from noise and vibration at levels likely to cause pollution outside the site. We are satisfied that this condition will be sufficiently protective in conjunction with the measures described by the applicant for minimising noise and vibration production at the installation.

9.5 Fugitive emissions

Appropriate measures for preventing and minimising fugitive emissions will be put in place in accordance with the SGN EPR6.09 'How to comply with your environmental permit for intensive farming'. These include:

- All building and infrastructure will be maintained in good repair.
- Areas around buildings to be kept free from build-up of manure, slurry and spilt feed. Footbaths will be managed so that they do not overflow
- Underground tanks will be used to store dirty water. These will be built to specifications in SGN EPR6.09 'How to comply with your environmental permit for intensive farming' and have level indicators to monitor capacity

As well as management techniques to prevent and minimise fugitive emissions, the applicant has specified the following measures to specifically reduce fugitive dust emissions:

- Feed to be stored in purpose built covered feed bins
- Feed to be blown directly from bulk feed HGVs into the bins and then piped directly to shed
- The sheds will be managed to maintain the poultry litter in as dry and friable condition as possible
- No litter to be stored at site
- The sheds will be managed to maintain the poultry litter in as dry and friable condition as possible. Dust is controlled through the management of litter and air quality. This will encourage slow movement of water along the trenches through the stones encouraging deposition of the solids washed off the roof.

Based upon the information in the application we are satisfied that the appropriate measures will be in place to prevent or where that is not practicable to minimise fugitive emissions and to prevent pollution from fugitive emissions.

10. 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.

These monitoring requirements have been imposed in line with in EPR 6.09 'how to comply with your environmental permit for intensive farming'.

11. Reporting

We have specified reporting requirements in Appendix 2, Schedule 4 of the Permit to ensure compliance with permit conditions and to monitor the efficiency of farming activities at the site in line with BAT. We made this decision in accordance with EPR 6.09 "*How to Comply with your Permit for Intensive Farming*".

12. Operating techniques

We have reviewed the techniques used by the operator and compared these with EPR 6.09 'how to comply with your environmental permit for intensive farming' and we consider them to represent appropriate techniques for the facility.

13. The permit conditions

13.1 Incorporating the application

We have specified that the applicant must operate the permit in accordance with descriptions in the application, including additional information received as part of the determination process.

These descriptions are specified in the Operating Techniques table in the permit.

13.2 Environment management system

There is no known reason to consider that the operator will not have the management systems to enable it to comply with the permit conditions. The decision was taken in accordance with RGN 5 on Operator Competence.

ANNEX 1: Consultation Responses

A) Advertising and Consultation on the Application

The Application has been advertised and consulted upon in accordance with Natural Resources Wales Public Participation Statement. The way in which this has been carried out along with the results of our consultation and how we have taken consultation responses into account in reaching our draft decision is summarised in this Annex. Copies of all consultation responses have been placed on Natural Resources Wales public register.

1) Consultation Responses from Statutory and Non-Statutory Bodies

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A

2) Consultation Responses from Members of the Public and Community Organisations

a) Representations from Local MP, Assembly Member (AM), Councillors and Parish / Town / Community Councils

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A

b) Representations from Community and Other Organisations

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A

c) Representations from Individual Members of the Public

Response Received from	
Brief summary of issues raised:	Summary of action taken / how this has been covered
None	N/A