

From:
To:
Cc: [Planning](#);
Subject: RE: High Farm, Ugglebarnby - NYM/2020/0659/FL and 0660/FL
Date: 05 February 2021 16:09:38

Dear Ailsa

I have now had time to consider both the detailed outputs of the SCAIL modelling and the Ammonia Emissions Report as produced by Promar International.

My concerns with regards to this development related to the potential for harmful emissions of ammonia from the development and the potential impact these may have on surrounding designated sites which are vulnerable to elevated levels of ammonia and other pollutants due to deleterious impacts on notified habitats and species. When considering the outputs of the SCAIL modelling, it is clear that the **background levels** of some or all of ammonia (NH₃), nitrogen deposition and acid deposition **exceed** the critical level/load for the following designated sites: North York Moors SSSI, SAC and SPA, Littlebeck Wood SSSI, Whitby-Saltwick SSSI, Biller Howe Dale SSSI, Robin Hoods Bay:Maw Wyke to Beast Cliff SSSI and Beck Hole SSSI. It is important to note that the process contribution of the development has not been considered, since the modelled emissions of the new development is equivalent to that modelled from the existing buildings, and are therefore incorporated into the background level readings (pre-date 2018).

With regard to the Habitat Regulations I therefore assert that;

- The development is not necessary for the management of any European designated site; and that
- The development **may** lead to a Likely Significant Effect on a European designated site, since the development could maintain an existing exceedance of critical thresholds above which deleterious impacts on habitats and species is expected.

A Habitat Regulations Assessment is therefore required.

As the application site is not located on, or adjacent to, any designated site, and no increase in stock numbers or vehicle movements which may be remote from the site are expected, direct impacts, non-aerial vectors and aerial vectors remote from the application site can be screened out of further assessment. When carrying out this Habitat Regulations Assessment, it is therefore only necessary to consider the indirect impact of the development through the elevated levels of aerial pollutants on the notified habitats and species or their supporting habitat of the designated sites.

The Ammonia Emissions Report provided by Promar International has assessed that there are benefits of the development over the existing baseline conditions, with improved building design and herd management methods estimated to deliver a likely 10% reduction in ammonia emissions from the development when compared to the current situation. Moving the feed lots indoors will also reduce spoiling of feed (and therefore costs/emissions sourced from its manufacture and transport) and eliminate diffuse pollution currently running from the feed lot site onto surrounding land thereby removing a potential water pollutant and removing a source of further ammonia emissions. Several other management actions are also detailed, each of which will lead to an expected decrease in ammonia emissions of between 7 and 20%.

Although it is noted that in combination the reduction in emissions may not equal the

addition of each of these savings if measured in isolation, it is clear that, if the management recommendations and new building design is implemented as proposed, there will be a **net reduction in emissions** from the holding compared to the current situation. This net reduction will contribute to one of the conservation objectives for the North York Moors SAC and SPA which sets out to; *“Restore the concentrations and deposition of air pollutants to below the site-relevant Critical Load or Level values given for these features of the site on the Air Pollution Information System”*. In the absence of other impacts, the development may therefore be considered beneficial for the condition of the nearby European designated sites.

It is therefore possible to **rule out a Likely Significant Effect** on the nearby European designated sites; the North York Moors SAC and SPA. As a net reduction in ammonia emissions is also likely to be beneficial for the conservation status of surrounding SSSIs as well, and certainly cannot be considered detrimental to any, we can also further rule out any risk of harm to nationally designated sites.

I would therefore support this application, provided that section 2.3.1 of the Ammonia Emissions Report by Promar International and dated 23 Jan 2021 is conditioned to secure the proposed management improvements that will produce this reduction in emissions.

Kind regards

Elsbeth

Elsbeth Ingleby MA_{Cantab} ACIEEM

Ecologist

North York Moors National Park Authority

The Old Vicarage, Bondgate, Helmsley, York YO62 5BP

Main office: 01439 772700

From:

Sent: 26 January 2021 07:20

To: Ailsa Teasdale

Cc: Elsbeth Ingleby ; Planning
<planning@northyorkmoors.org.uk>

Subject: High Farm, Ugglebarnby - NYM/2020/0659/FL and 0660/FL

Dear Ailsa – I hope you are fit and well.

Please find attached final SCAIL report in connection with the above site for your consideration and approval.

If you are able to let us have a new determination date that would be helpful many thanks.

Kind regards

Cheryl Ward Planning
MSc MRTPI

A dark green business card for Cheryl Ward Planning. The card features the text 'Chartered Town Planner' and 'MSc MRTPI' in the top left. Below this is a red telephone icon next to a white rectangular redaction box, and a red globe icon next to the website 'www.cherylwardplanning.co.uk'. On the right side, the name 'Cheryl Ward' is written in a large, white, serif font, with 'Planning' in a smaller, white, sans-serif font below it. The card has a decorative orange and purple geometric shape on the right edge.

Chartered Town Planner
MSc MRTPI

 

 www.cherylwardplanning.co.uk

Cheryl **Ward**
Planning



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Before printing, think about the environment

From:

Cc: [Planning](#)

Subject: NYM/2020/0660/FL and NYM/2020/0659/FL - High Farm, Foss Hill, Ugglebarnby

Date: 24 September 2020 12:25:22

Dear Ailsa

These applications propose the installation of two new agricultural buildings for use for feeding of cattle and dairy cubicles to replace external straw bedded yards. Building one (0659/FL) has a floor area of 592m² whilst building two (0660/FL) has a floor area of 219m², leading to a combined additional internal floor area of 811m². All livestock produce gaseous emissions which can contribute to local air pollution impacts on surround site of natural environment importance. Natural England has produced Impact Risk Zones for sites designated as important for nature, including SSSIs, SACs and SPAs. The application for building one has triggered the risk zones for air pollution due to potential impacts it may have on surrounding designated sites due to its size and location.

Whilst I accept that the applications clearly state that it is not anticipated that livestock numbers will increase as a result of this application, and that the buildings are to replace open air feed lots where livestock are likely to be similarly concentrated within a restricted area, we do not have sufficient information available to estimate how moving the emission sources to an internal environment will affect emission dispersal from the site and therefore whether local air quality will be positively, negatively or neutrally affected by the proposed buildings. I would therefore request that a SCAIL assessment is carried out (this can be done by following this link; <http://www.scail.ceh.ac.uk/>) to screen the likely impact of the proposals on local air quality in isolation and therefore enable us to determine whether further information is required to determine the relative impact, whether positive or negative of the proposals. As a minimum this assessment will need to be carried out on the basis of the larger building (building one) which triggered the risk zone, however I would strongly recommend that both buildings are included in the assessment to give an accurate reflection of the emissions from the new development in its entirety which would be required should 'in combination assessment' be required. If the applicant has access to information relating to the impact of enclosing feed and cubicle areas on air quality in comparison to open straw bedded cubicle and feed areas from a recognised credible and authoritative source that they wish to submit as supporting information then that would be helpful.

With regard to the information in the application forms and supporting statements I am a little confused whether foul sewage from the buildings is to be directed to the old weeping wall slurry store or the new slurry lagoon that was approved in March 2018. The application forms state the weeping wall store, but the planning statement for building one states the slurry lagoon. It would be helpful if this could be cleared up and confirmation received that the additional wastes will be easily stored within capacity of the units without any impact on the farm's ability to comply with minimum winter storage etc.

Many thanks

Elsbeth

Ecologist

North York Moors National Park Authority

The Old Vicarage, Bondgate, Helmsley, York YO62 5BP