

## **The residents/properties neighbouring Coppice Farm, as detailed at the end of this letter.**

26th June, 2023.

Mr. Alan Harvey,  
Principal Planning Officer,  
East Staffordshire Borough Council,  
Wetmore Road,  
Burton-on-Trent,  
Staffordshire,  
DE14 1LS.

Dear Mr. Harvey,

### **Planning Application P/2020/00635 – further objections.**

We note the Planning Committee has not met since the local elections in early May, so hope there is still the opportunity to place on record concerns relating to the above application.

#### Ammonia

The UK Government states ammonia is a key air pollutant that can have significant effects on both human health and the environment. It has set targets to reduce ammonia emissions by 8% in 2020 and 16% in 2030, compared to 2005 levels. Is the Council able to explain how granting permission for such a major emitter of ammonia might be reconciled against this goal?

We welcome the additional research carried out by the applicant in relation to the in-combination effects of the P.D. Hook unit in Abbots Bromley, along with that into the local SAC/SSSI sites. However, we note no actual measurement has been attempted at those sites and no consideration has been given to the impact of other agricultural practices in the area, specifically spreading of manure and slurry on the fields, both belonging to the applicant and other local farms. Remember, once these extremely rare ecosystems have been damaged by ammonia deposition, they will be lost forever.

An academic study, quoted in Science (Vol 374, Issue 6568 - see <https://www.science.org/doi/10.1126/science.abm3492?cookieSet=1>), titled “How ammonia feeds and pollutes the world”, concludes it is cheaper to cut ammonia emission now than to deal with its consequences later. The abstract from this report is as follows:  
“Ammonia, with the chemical formula NH<sub>3</sub>, is a common ingredient in many industrial and agricultural applications and plays a pivotal role in producing the fertilizers needed to produce enough food for 7.9 billion people. However, the agricultural use of ammonia also negatively affects the environment, resulting in the loss of biodiversity and the pollution of water, air, and soil. Ammonia contributes to the formation of nitrous oxide, a powerful greenhouse gas, worsening the problem in most scenarios .... [The authors] show that the

economic cost associated with the loss of human life - owing to ammonia's contribution to air pollution alone - far outweighs the economic cost to curb ammonia emission".

It would appear to us that allowing this expansion simply ignores the dangers associated with ammonia.

### Noise

A number of residents have repeatedly complained of noise from the existing unit, which can be heard inside their properties. It was assumed this was from the fans but it would appear it is created by lorries unloading feed into the hoppers on site. The noise survey provided by the applicant covered one twenty four-hour period, during which no deliveries were made to the site. We have previously requested a noise survey be conducted covering an operating cycle at the factory and request the full impact of noise created by an enlarged Coppice Farm be considered by the planning authorities. The applicant has made no attempt to quantify the noise caused by this element of the existing operation.

### Odour

Figure Six of the applicant's Odour Report models the maximum annual 98th percentile hourly mean odour concentrations (OUE/m<sup>3</sup>) around the turkey factory. The map shows a length of Hobb Lane (approximately 500 metres) would experience levels over 5.0 OUE/m<sup>3</sup>. Between 5.0 OUE/m<sup>3</sup> and 10.0 OUE/m<sup>3</sup> is defined by UK Water Industry Research as likely to give rise to a "significant proportion of complaints". Further, of this section, 300m is modelled to experience levels over 10 OUE/m<sup>3</sup>, defined as "likely to cause annoyance".

In a hearing held on 11th January, 2023 by an Inspector appointed by the Secretary of State into the erection of four poultry buildings at Footbridge Farm, Tasley, Bridgnorth WV16 5LZ, the inspector sited one of the main issues to be the effect of the proposed development upon the living conditions of nearby occupiers ... with regard to odour.

The inspector's report states:

"I have paid regard to the appellant's Odour Assessment [prepared by AS Modelling & Data Ltd]. There has been considerable debate regarding the odour assessment and the modelling underpinning its conclusions. I acknowledge that odour dispersal modelling is not an exact science and is based on a number of variables. However, I am not satisfied that as submitted it properly considers the odour effects of the proposed development.

The assessment fails to consider peak odour concentrations at the end of the growing cycle and during the clearing out of the poultry buildings. Moreover, limited explanation is provided for the input data selected and the methodology adopted. These factors combined with the absence of empirical evidence to support the assessment and conclusions leads me to determine that the odour assessment does not adequately model the impact resulting from the proposed development. Therefore, in my judgement, the conclusions reached in the assessment cannot be relied upon.

Taking the odour assessment as submitted it concludes that the 98th percentile hourly mean odour concentration resulting from the proposed development, taken at receptors outside of Footbridge Farm, would accord with the Environment Agency's benchmark figure for moderately offensive odours.

The nearest dwelling to the site is The Leasowes and whilst odour concentrations at the dwelling would accord with the benchmark figure, it is evident that part of the garden would experience odour concentrations in excess of this figure resulting in the occupiers experiencing offensive odours when outside.

Based on the evidence before me including my observations during the site visit it is apparent that the occupiers use a significant proportion of the grounds for recreational purposes including areas close to the boundary with Footbridge Farm. In my view, odour resulting from the proposed development would be more apparent to the occupiers of The Leasowes, irrespective of the use of air scrubbers, unduly affecting their living conditions. Whilst the Council's Regulatory Services Officers did not raise concerns to the application this does not alter my findings in respect of this issue.

I am not satisfied that the odour assessment as submitted is sufficiently robust given the merits of the development proposed. Even if I were to take the assessment at face value it still demonstrates that odour resulting from the poultry sheds would unduly affect the living conditions of nearby occupiers.”

Rather than being used by a single family, this section of Hobb Lane is used by many local residents to access their properties, whilst it is also enjoyed by a large number of walkers, runners, cyclists and horse riders on a regular basis for recreational purposes. We contend the impact of the excessive odour on this section of Hobb Lane has not been given sufficient weight in the discussion.

#### Traffic

In our previous letters, we have highlighted that no consideration has been given to movements to/from the rest of the applicant's land off Hobb Lane. The majority of the applicant's surrounding land is now sown to grass, which is cut for silage when ready, typically four or five times each year. Our estimate is there will be 200 journeys to/from the site at each cut. In order to help the grass grow, slurry and/or manure is regularly applied, resulting in more arrivals/departures. And additionally, volumes will be further increased to service the recently constructed straw barn, sited immediately to the south of the existing turkey factory. On this basis, and if we accept the numbers quoted in the most recent Transport Statement, the applicant will be responsible for in the region of 2,000 movements by HGV or tractors with trailers per year from his land off Hobb Lane.

Additionally, a number of residents have experienced issues with HGVs serving the turkey factory. They are too long to pull into the passing places and too high, which means there is often damage to the trees in Hobb Lane. They also refuse to reverse, which further complicates passing manoeuvres on a single-track lane.

We thank you, once again, for the opportunity to comment on this application and trust our comments and concerns will be considered in detail prior to any decision to grant an extension being given.