

## **Application EPR/UP333ORL/A001 for an environmental permit for an Intensive Poultry Unit at Astman's Farm, Main Road, Overton, Maisemore, Gloucester, GL2 8HR.**

Maisemore Parish Council met on 6th March 2017 with a significant number of residents in attendance and this submission reflects the views and concerns of the Council and residents.

The Council is concerned that in some previous applications for permits for similar units elsewhere, the Environment Agency did not fully examine all relevant environmental issues although the granting of a permit implied to the Local Planning Authority that it had, so they were not fully considered when deciding the planning application. If a permit is granted for this application, therefore, the Council will require a statement from the Environment Agency clarifying exactly what has been taken into account so that the consideration of any planning application can deal with any other environmental issues.

A copy of this submission is being sent to Tewkesbury Borough Council's planning and Environmental Health Departments to ensure that they are fully informed.

### **Unit size**

The application notice refers to a unit ">40,00 Poultry". This is an understatement as the plans show two x 50,000 bird sheds, which would make it a 100,000 bird unit. The application form refers to 4 sheds so the application could be for a 200,000 bird unit. In either case, this brings the unit size above 85,000, for which a full Environmental Impact Assessment is required under the Environmental Information Regulations. At this size, it is clearly an industrial installation and should comply with the relevant regulations.

Crop cycle times in intensive poultry units are continually being reduced and may be as low as 19 days. On the basis of a more typical 21 days, there would be around 17 crop cycles per year in each house, meaning that all start and end of crop cycle operations would be happening on the site at 10 or 11 day intervals.

### **Water pollution**

The possibility of water pollution is major concern, as poultry litter is high in phosphate and nitrogenous compounds.

The proposed site is immediately adjacent to a watercourse. This is referred to in the application as a 'ditch', but it is, in fact, a stream feeding Maisemore Lake which provides an important local amenity. It is stocked with fish and provides a habitat for many species. Overflow water runs directly into the continuation of the stream and into the River Severn within a few hundred metres of the lake. Any pollution of this watercourse and lake would be a major environmental failure.

The application assumes 'clean or lightly contaminated' water from yard and roofs being discharged into this watercourse. Roof run-off is likely to be heavily contaminated with dust from 16 ventilation fans. The yard is unlikely to be free of contamination especially around end of crop cycle, particularly in wet weather. The proposed safety measures assume 100% reliability and consistency in closing drains, etc., which is unlikely to be achieved in reality. There remains a high risk of polluting this watercourse.

The application refers to water used for washing units at the end of each crop cycle being held in storage tanks. Avoiding pollution requires 100% adherence to procedures, which is unlikely to be achieved. The proximity to the watercourse means that even the slightest failure would result in pollution of the watercourse.

The application also refers to foul water being discharged to a sewer. Maisemore's sewer system relies on pumping and it is already over capacity, resulting in raw sewage being discharged onto the roads after heavy rain. Capacity will be further over-stretched when nearly 50 new houses are built, for which outline planning permission has already been granted, so the system certainly could not cope with any extra discharge from the proposed unit.

The emissions section of the application refers to a 'clean-up kit', but any accidental spillage - especially in wet weather - would be impossible to intercept before reaching the watercourse unless the response was instantaneous.

The means of removing dirty water from storage tanks after washing operations is not described in the application.

### **Air pollution**

Despite the proposed control measures, we believe this remains a serious risk. Measures introduced to help reduce smell include keeping the litter as dry as possible, but this inevitably causes an increase in dust.

There is no reference to particulates in the application and we believe it would be premature to grant a permit for the proposed unit before the new government plan on air pollution is published within the next month or so.

The valley siting of the proposed unit will concentrate the flow of pollution and odour towards the village and will directly affect existing homes and the new ones for which planning permission has been given.

Any smell will be ammonia based and highly penetrating. Houses are now being built in the village to high energy standards (see Maisemore Parish Council's planning policy document attached) including some with mechanical ventilation and heat recovery, which makes them particularly susceptible to odour levels. Smell can't be filtered out and it is impractical to filter out particulates. Particulate emissions need to be reduced at source, and the application does not deal with this requirement.

### **Litter removal**

Arrangements for litter disposal are not clear. Litter can only be spread at certain times of year and is weather-dependent. The application contains no information about how or where litter will be stored until it can be spread or where it will be spread or what measures will be taken to ensure that it does not cause air or water pollution. This means that we cannot tell whether the storage or spreading will be within the Parish or which roads might be affected by the tractor and trailer movements generated.

The application refers to a Manure Management Plan, but this does not appear to be included in the application or on the Environment Agency website

Section 8k of the application says that manure or slurry will be spread on land owned or controlled by the operator, but that does not seem to be consistent with statements elsewhere that it will all be removed.

### **Noise pollution**

The siting of the proposed unit means that the fans will be clearly audible by many residents, especially with the concentrating effect of the valley location. The proposal is for 16 high velocity fans - which could be 32 if there are actually 4 houses, and the speed of operation is a factor in increasing the noise generated.

Catching of birds at the end of a crop cycle inevitably begins in the very early morning. It is extremely unlikely that all the noise reduction proposals will be consistently implemented, so this operation - every 10 days or so, will generate a disturbing level of noise for residents at unsocial hours.

### **Climate change levy**

There is no climate change levy agreement. We believe this should be required, as energy for the unit is not generated on site by renewable means.

### **Traffic**

Deliveries of birds and feed and collection of crop will be by HGV accessing the A417. These lorry movements should not go through Maisemore village, as there are considerable access problems at the Over roundabout where the A417 joins the A40. The A417 is also subject to flooding between Maisemore and the A40, causing road closure resulting in long delays and diversions along narrow country lanes.

Litter removal will be by tractor and trailer. It is not known whether these will need to pass along narrow lanes.

A table of expected traffic movements is attached, based on two x 50,000 bird units and a crop cycle time of 21 days. These figures are calculated from those obtained by the Campaign to Protect Rural England and exceed 17,000 traffic movements per year.

### **Proximity to footpaths**

There are public footpaths close to the proposed site - one along the watercourse and another to join the A417 straight across the field in which the development is proposed. A unit like this should not be located so close to public footpaths.

### **Visual amenity**

The proposed unit would be clearly visible from the A417 and adjacent public footpaths and would detract from the visual amenity of the area, which is extensively used by walkers and cyclists.