

**ARNCOTT PARISH COUNCIL – ADDITIONAL COMMENTS**

**OBJECTION TO PLANNING APPLICATION 20 / 00871 / F**

**FREE RANGE EGG PRODUCTION UNIT – PALMER AVENUE, LOWER ARNCOTT**

The content of this objection is in addition to the previous objection submitted on 9<sup>th</sup> April 2020. As stated in that document, Arncott Parish Council strongly objects to this application and is of the opinion that the application is fundamentally the same as the previous application 19 / 00644 / F. This application seeks permission to construct the same type of facility on the same area of land which would create the same hazards as the previous application would have done had it been approved. Arncott Parish Council is still of the opinion that the construction and future operation of this facility would, over time, have a detrimental effect on the local land area adjacent to and beyond the site, the local wildlife habitat and the local ecology. Arncott Parish Council is also concerned as to what impact the ongoing operation of this site would have on the health and well-being of local residents. The opinion of Arncott Parish Council is that this planning application should be refused.

Much time and effort from many people went into producing the numerous consultation reports and the 90+ public objections that were submitted in opposition to the previous application. It is disappointing to be advised by CDC that none of those reports or objections can be considered as valid for this application. The reasons given in those reports and objections as to why people were, and still are, opposed to this facility being built are still very relevant and should be considered valid for this application. It should also be pointed out that some of the documents submitted on behalf of Potters Poultry for the previous application can also now be found in the CDC planning register for this current application. Why are those documents permitted to be used ? One rule for Potters Poultry and another rule for the general public it would seem.

The large number of objections to the previous application were submitted because many, many people consider that the construction and use of this facility would be very detrimental to the local environment and to peoples' health and well-being. People living in the local area are well aware that the residents in Ambrosden village together with the pupils and staff at Five Acres School have had to endure many instances over the years of the foul odours, stench and dust that have emanated from the chicken farm situated close to that village. In periods of hot weather those odours make it especially difficult for the residents, staff and pupils if the doors and windows are open. If this facility is built then the residents across the local area, and in particular, the nearby farms and the staff and inmates in Bullingdon Prison would likely find themselves in a similar situation.

Mention must be made of the fact that the authorities at Bullingdon Prison were not aware of this current application until they were notified by Arncott Parish Council. Bullingdon Prison is in close proximity to the site of this proposed facility. However, it would seem that CDC did not consider it necessary to include Bullingdon Prison on the neighbour consultee list. Why not ? CDC did not notify the Bullingdon Prison authorities regarding last year's application and CDC have not notified them about this current application.

**ENVIRONMENTAL IMPACT ASSESSMENT – SIGNED OFF BY CDC ON 31<sup>ST</sup> MARCH & AGREED BY CDC ON 6<sup>TH</sup> APRIL AS AN UNNECESSARY REQUIREMENT !!!**

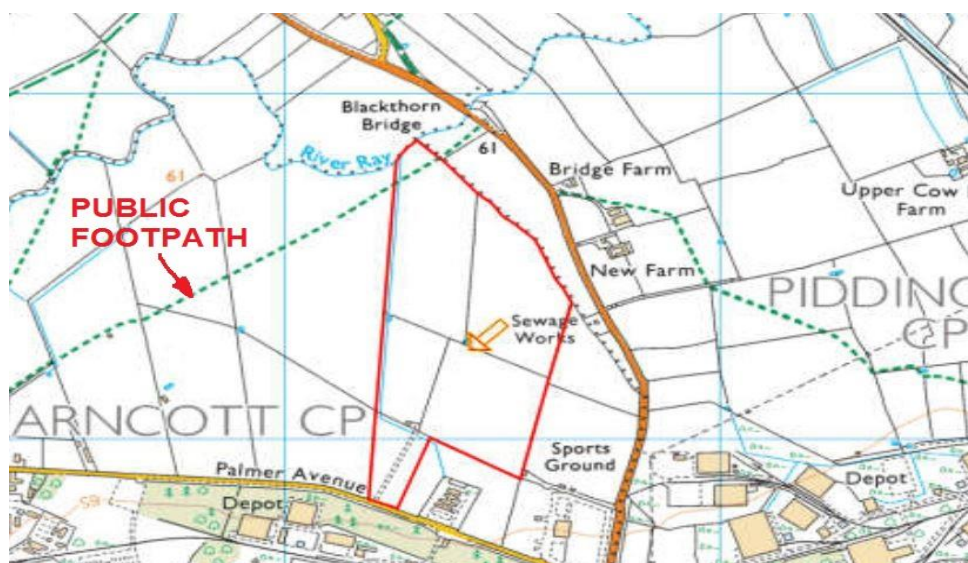
With reference to document *EIA- 20-00871-F Land Adj Palmer Ave L Arncott* in the CDC planning register for this application. The decision that an environmental impact assessment is not required for this application is a farce and demonstrates a complete lack of awareness or appreciation of the land area in question. How can it possibly be considered that an environmental impact statement is not necessary for this application ? An online search reveals that **"....Schedule 2 development for which EIA is required only if the project is likely to give rise to significant environmental effects. These are developments which include intensive fish farms; large pig and poultry units...."** The construction of this poultry unit would definitely have significant effects on the local environment. Who decided that it wouldn't ? It is naive to suggest that this site and the surrounding

land area would not be sensitive to any environmental change brought about from this facility being built. The River Ray and its associated floodplains are part of the Oxfordshire Conservation Target Area scheme and this land area together with others downriver would be environmentally threatened from the operation of this facility.

It is stated that there are no public footpaths on or immediately adjacent to the site. That statement is wrong. There is most certainly a public footpath near the site. The site location to be considered can be seen in the flood risk assessment document submitted by **Hydro Logic Services dated 23<sup>rd</sup> January 2019 - page 3, figure 1**. Figure 1 clearly shows the public footpath as a green dotted line coming from Arncott and going across the back of the site near to the River Ray before emerging onto the B4011 near to Blackthorn Bridge.

The existence of the footpath can also be seen on the website "<https://footpathmap.co.uk/map>".

**Map shown in the Hydro Logic Services flood risk assessment document page 3, figure 1**



Further, it is stated that it is unlikely that the development would produce significant amounts of waste, pollution, nuisances or have detrimental impacts on human health. It is also considered that the site would be unlikely to give rise to complex, long term or irreversible impacts.

That is a ludicrous conclusion to make. The arguments presented in the document **190719 BBOWT Chicken Farm, Arncott v1** which was submitted for the previous application clearly show that an environmental impact assessment is warranted. Those arguments are still relevant and should be considered for this planning application.

**MANURE**

The Management Plan documents submitted for both this and the previous application give the estimated amount of manure that would be removed from the site. However, it should be noted that the figures shown in the documents relate **ONLY** to the manure quantities that would be removed from the egg laying building via the use of the conveyor system – **NOT** from the complete site.

There would seem to be several contradictions within the Management Plan documents and the Design & Access document with regard to how much manure would actually be removed from the site.

Consider table 1. The figures shown for the manure removal cycle time and the manure amount removed per cycle are those stated in the **Management Plan documents sections 1.0, 7.0, 9.0 & 12.0** and the **Design & Access V2 document page 6**. Based on those figures, the estimated amounts of manure removed from the egg laying building per year varies between a maximum of 1,168 tonnes and a minimum of 510 tonnes. Which of the quantities shown is correct ?

**Table 1 - Manure removal from the egg laying building ONLY - NOT from the whole site**

Document Reference	Manure removal cycle time	Number of manure removals per 12 months (365 days)	Manure amount removed per cycle	Manure amount removed per month	Manure amount removed per 12 months
Management Plan docs for this app & app 19/00644/F section 1.0, para 4	5 days	73 ( 365 / 5 )	16 tonnes	97 tonnes	1168 tonnes
Management Plan docs for this app & app 19/00644/F section 1.0, para 4	7 days	52 ( 365 / 7 )	16 tonnes	69 tonnes	832 tonnes
Management Plan docs for this app & app 19/00644/F section 9.0	10 days	36 or 37 assume 37 ( 365 / 10 )	14 tonnes	43.2 tonnes	518 tonnes
Design & Access V2 document, page 6, paragraph 7	10 days	36 or 37 assume 37 ( 365 / 10 )	14 tonnes	43.2 tonnes	518 tonnes
Management Plan docs for this app & app 19/00644/F sections 7.0 and 12.0	425 days (365 + 60) (14 months)	States 1 cycle of 595 tonnes in 14 months	595 tonnes	42.5 tonnes	510 tonnes

How much manure would likely be produced per year by the 59,000 hens that would be housed at this facility ? The hens would defecate both inside of the egg laying building and on the ground of the outside paddocks across the extent of the site. Consider table 2. The figures were copied from three websites that give information about poultry.

**Table 2 - Estimated manure production from 59,000 hens for whole site**

Reference	Manure produced per month per hen	Manure produced per month by 59,000 hens	Manure produced per year by 59,000 hens
<a href="https://www.ctahr.hawaii.edu/oc/freepubs/pdf/GHGS-02.pdf">https://www.ctahr.hawaii.edu/oc/freepubs/pdf/GHGS-02.pdf</a>	One hen will produce 59Kgs per year so 4.9Kgs per month	290 tonnes	3,480 tonnes
<a href="http://www.fao.org/3/al718e/al718e00.pdf">http://www.fao.org/3/al718e/al718e00.pdf</a>	1000 hens produce 120Kgs per day so 3.65Kgs per hen per month	215 tonnes	2,584 tonnes
<a href="https://www.motherearthnews.com/homesteading-and-livestock/raising-chickens/chicken-manure-fertilizer-zm0z13amzkon">https://www.motherearthnews.com/homesteading-and-livestock/raising-chickens/chicken-manure-fertilizer-zm0z13amzkon</a>	One hen will produce between 3.6Kgs to 5Kgs per month	Between 212 and 295 tonnes	Between 2,544 and 3,540 tonnes



Based on that information, 59,000 hens would produce between 3,540 tonnes and 2,544 tonnes of manure per year. If the maximum annual amount of manure removed from the site is only the 1,168 tonnes from inside the egg laying building then there would be between 1,376 tonnes and 2,372 tonnes of manure left on the ground in the outside paddocks per year - each and every year.

## **DRAINAGE & FLOODING**

The site boundary line can be seen in the document submitted by **Hydro Logic Services dated 23<sup>rd</sup> January 2019 - page 3 fig 1 and page 4 figs 2 and 3**. It can be seen that the boundary line at the rear of the site runs close to the bank of the River Ray.

The **Hydro Logic Services document page 1, 4)** mentions that most of the site is located in a soil type that has impeded drainage. The percentage runoff for this soil type was found to be high at 51.56%. Consequently, it is considered unlikely that surface water could be managed using a system based around infiltration.

It is stated in the **Hydro Logic Services document - page 6, section 2** that the fluvial risk of the site being flooded ( i.e. from the River Ray overflowing) is low but that surface water flooding and runoff needs to be considered.

It is stated in the **Hydro Logic Services document - page 7** that flood risk from all sources is low excepting surface water (pluvial) and fluvial (River Ray overflowing).

It is stated in the **Hydro Logic Services document - page 9, 3c** that pluvial flooding (i.e. the ground can no longer absorb the water) poses the biggest threat of flooding on the site and that surface water risks derive from the poorly draining clay-dominated soils which exist on the site.

The **Hydro Logic Services document states on page 6, 2a** that the existing development site falls completely within the zone 1 low risk flood category. This statement is **ONLY TRUE FOR** the proposed buildings. Reference to **page 6, figure 4** ( below ) shows that, whilst the egg laying building and other development would reside within flood zone 1, at least 50% of the entire site resides in flood zone 3 with a smaller percentage residing in flood zone 2. This is corroborated in the recently issued document on 19<sup>th</sup> March 2020 from **Hydro Logic Services, page 4, paragraph 2 - Response to comment on FRA-from-LLFA-19032020 Issue**



As previously mentioned, not all of the manure produced on the site would be removed from the site. There would be enormous amounts of uncomposted chicken manure laying on the ground across the extent of the site throughout the course of each and every year.

In periods of heavy rain the large quantities of manure laying on the ground would be turned into a slurry. The pasturelands in and around the site do not drain well through the ground so the slurry that would not be absorbed by the ground would mix with the storm water on the ground. The slurry would contain concentrated amounts of nitrogen and phosphorous and these would travel across the site in the slurry mix and into the adjoining pastureland, ditches and hedgerows as the storm waters drained away and receded towards the River Ray. Uncomposted chicken manure is very strong and can damage plant roots and kill off some plant types.

It's worth repeating that the River Ray and its associated floodplains are part of the Oxfordshire Conservation Target Area scheme. The consequences of the excessive amounts of nutrients from the manure slurry continually finding their way into the waters of ponds, ditches and the River Ray would be severe. Algae blooms would be formed in these waters which would block out sunlight. As the algae and plants die, the decomposition process would deplete the dissolved oxygen in the water and that would kill off fish and other aquatic life.

Both the Hydro Logic Services document and The Management Plan V2 document point out that swales and an attenuation basin will be used to control the clear surface water runoff from the impermeable area of the site. The output from both of these would be discharged into the existing on-site drain which, in turn, would flow out into the River Ray. Presumably, the impermeable area of the site is only that part of the site that would be built on and concreted over. The location of the attenuation basin and swales can be seen in the **Hydro Logic Services document - Response to comment on FRA-from-LLFA-19032020 Issue – page 10, figure 6.**

Mention is made that the attenuation scheme would be able to cope with the surface water runoff from the developed part of the site in the zone 1 low flood risk area unless a “certain” rainfall event happens. Should that “certain” rainfall event happen and the attenuation basin overflowed the runoff water would naturally flow North towards the River Ray.

Only the part of the site to be developed and concreted over would be in the zone 1 low flood risk area. The remainder of the site, outdoor paddocks and the surrounding land area are located in flood zones 2 and 3. The reality is that a lot of this site and the surrounding land area has been flooded several times over recent years – most recently February of this year as a result of the severe rainfall across the whole of the country. The River Ray overflowed into the surrounding pastureland and this will probably happen many more times in the future. The attenuation basin and swales built on the developed part of the site may not get flooded but their output will join the already flooded land areas.

## **NOISE**

The latest **Management Plan document V2, section 11.0** states that 12 ridge mounted high velocity mechanical fans would be used to control the ventilation and temperature inside of the egg laying building.

The issue of noise levels that would come from the site is considered in a document compiled and submitted by **Matrix Acoustic Design Consultants - M1928 R01 Palmers Avenue – Noise Impact Assessment dated 18<sup>th</sup> June 2019**. This document was also submitted for the previous application. **Section 2** in this document contradicts the latest Management Plan document V2 because it is stated that 22 roof mounted extractor fan units – not 12 - would be used in two rows of 11.

It is stated in the **Matrix Acoustic Design Consultants document - section 2** that the choice of type, make and model of the extractor fan to be used at this facility is unknown at this time and has yet to be decided. Calculations for noise levels have been based on a fan unit manufactured by a company called Big Dutchman. The fan unit FF091-6DT has been used for the assessment. The online brochure from Big Dutchman states that the sound power level at the fan unit (the source)

would be 75 decibels but that the sound pressure level would be 50 decibels at a distance of 7 metres away from the fan unit. These decibel figures apply to a single fan unit. This facility would have 12 or 22 fan units so the likely combined noise levels would be 61 decibels from 12 fan units and 64 decibels for 22 fan units. Given that a vacuum cleaner emits approximately 70 decibels at a distance of 1 metre, the noise emitted from the Big Dutchman fan units could not, in fairness, be considered as excessive.

It is stated in the **Matrix Acoustic Design Consultants document - section 6** that if fan units are selected that have a significantly higher noise output than the fan unit used for their calculations then their recommendation is that the assessment is repeated using the correct data from the chosen fan unit.

As the choice and number of fan units for the proposed facility is not known at this time, the actual noise levels that would be emitted from the site are still to be established.

The **Matrix Acoustic Design Consultants document - section 2** states that the only plant noise generated would come from the roof mounted extract fans. However, the submission of the **Ammonia update\_Redacted document** would suggest that one or more air cleaning unit(s) would be installed and used to filter out ammonia from the air inside the egg laying building. Would these units be installed? If yes, how many units would be installed and what would be the noise levels generated by one or more of these units?

What, if any, assessments have been done or will be done to determine how much noise would be made by 59,000 hens? – particularly when large numbers of them would be in the outside paddocks.

When unwanted hens need to be caught to be removed from site, would this activity take place at night and, if so, how often and what levels of noise would be made?

### **AIR POLLUTION FROM AMMONIA, ODOUR & DUST**

With reference to the submitted **Odour Management Plan document dated June 2019**, the information presented in the tables on pages 2 and 3 would seem to apply only for the inside of the egg laying building. The first reference to ammonia shows that it is recognised as a potential risk and problem with regard to the manufacture and selection of feed. Adopting the correct methodology of how the feed would be prepared would, apparently, minimise those ammonia emissions. The second reference to ammonia is with regard to litter management. It's written that the action to be taken to minimise ammonia issues from litter management is to use sawdust. The document gives two references as to how ammonia levels could be minimised but no details are given with regard to how the ammonia produced would be dealt with and prevented from escaping into the atmosphere.

As already mentioned, the submission of the document **Ammonia update\_Redacted document** would imply that one or more air cleaning unit(s) would be installed and used to filter out ammonia from the air inside the egg laying building. Again, the question – would one or more of these units be installed?

On **page 4** of the document, it is stated that the use of this air cleaner would reduce ammonia quantities by an average of 89%. On **page 5**, for partial cleaning, the figure is 58%. What quantity of ammonia would be produced inside the egg laying building? What quantity of ammonia would 89% and 58% represent? The remaining 11% - 42% of ammonia would be sucked out of the building and blown into the air.

The air cleaner(s) would only be of use for the egg laying building. What levels of ammonia gas would be emitted from the outdoor paddocks? What methodology, if any, could or would be used to control and mitigate the ammonia emissions into the air from the outdoor paddocks?

The content in the submitted document **Palmer Avenue Ammonia Report sh110918** relates to the modelling of the dispersion and deposition of ammonia from this facility. **Page 7, section 3.5** seeks to explain the quantification of ammonia emissions.

**Section 3.5.2** states that it is assumed only 12% of the manure produced by 59,000 chickens would be deposited onto the ground of the outside paddocks / ranging areas. According to table 2, the remaining 88% would be dropped in the egg laying building at night.

The data given in the **Management Plan** and **Design & Access documents** shows that the quantity of manure that would be removed from the building each year would be anything from a maximum of 1,168 tonnes to a minimum of 510 tonnes. Online research suggests that a maximum of 3,540 tonnes and a minimum of 2,544 tonnes of manure would be produced per year. If only 12% of the total manure production is deposited outside of the building then the quantity of manure left inside of the building must be within a maximum of 3,115 (88% of 3,540) tonnes and a minimum of 2,239 (88% of 2,544) tonnes.

It's highly unlikely to be the case that the annual amount of manure removed from the building will be considerably less than the annual amount of manure deposited in the building. That would suggest that the assumed figure of only 12% defecation outside of the building has to be wrong. It would seem that a far larger quantity of manure would be deposited on the ground of the outside paddocks than the figure of 12% that was used for this ammonia report. Taken together with the many variables and assumptions made in the compilation of this report, the validity of the concluding statement that ammonia levels from the site would satisfy the Environment Agency's requirements is questionable.

Inside of the egg laying building there would be poultry dust and vast quantities of fresh chicken manure. Poultry dust is likely to consist of dust from bedding together with a mixture of organic and non-organic particles, faecal material, feathers, dander, mites, bacteria, fungi and fungal spores. Uncomposted chicken manure can contain harmful pathogens such as cryptosporidium, E.coli and salmonella.

The extractor fan unit as shown in the Big Dutchman brochure mentioned previously does not appear to have any form of filtration unit built into it. If that, or a similar fan unit is used then those fan units would suck up the ammonia, stench and odour from the chicken manure together with the poultry dust and expel them into the outside air where they would be blown by the wind all over the local area. These pollutants would also find their way outside via the pop holes in the side of the building that would be used by the hens to gain access to the outside paddocks.

In dry conditions, thousands of chickens scratching at the ground in the outside paddocks would cause dust clouds to be formed. Those dust clouds would be similar to the poultry dust created in the building. The outside paddocks would be covered in uncomposted chicken manure. The dust clouds, stench and ammonia from the chicken manure would get blown by the winds across the local area.

It's likely that every time the egg laying building is cleaned out, the stench of chicken manure and large quantities of poultry dust would get dispersed into the outside air and blown away over the local area.

The creation of the ammonia, stench from the chicken manure and the poultry dust would be a continuous process as would their dispersal across the local area by the winds. It's probable that this would affect people living in the villages of Blackthorn, Arncott, Ambrosden and Piddington. In close proximity to this site, and probably most at risk, are the villagers of Blackthorn, the residents of Bridge Farm and New Farm and the staff and inmates in Bullingdon Prison.

The poultry dust could end up on peoples' clothes, in their cars and houses and pose a serious health threat to a lot of people. Breathing in the dust could affect peoples' respiratory system and cause problems such as a sore throat, coughing, and wheezing. People who suffer from asthma could be particularly vulnerable.

The close proximity of Bullingdon Prison to the site is cause for serious concern. With the winds blowing in the right direction, the stench of ammonia and chicken manure together with any dust and debris from the chicken facility would likely find its way into the confines of the prison. The environment within the prison will no doubt be a potentially hostile one to begin with. Having the smell and odour from the chicken unit circulating within the prison could provoke an adverse reaction from some of the inmates which could threaten the health and safety of other inmates and the prison staff.

## **LANDSCAPE**

The Design & Access document states that the egg laying building would be 159 metres long, 35 metres wide and approximately 8 metres high at the roof ridge. Protruding from the roof would be the funnels from 12 or 22 fan units (yet to be confirmed). A muck store measuring 15 metres long by 8 metres wide would be built. Eight food silos would be installed alongside the building and those would also be about 8 metres tall. A gatehouse would be built measuring 10 metres long by 7 metres wide. A house would be built measuring 10 metres long, 8.5 metres wide and 7 metres high.

At present, this land area is predominately open and flat grass land that is used by animals for grazing on and by people who want to walk in the fresh, open air of this countryside. It is unfortunate that this facility would be built on part of it. With no natural cover available, the development and sheer scale of this site would be a complete eyesore and not in keeping with the surrounding countryside. The construction of this facility should not be allowed to take place at the proposed location.