SOUTH PLANNING COMMITTEE

SCHEDULE OF ADDITIONAL LETTERS

Date: 29th August 2017

NOTE: This schedule reports only additional letters received before 5pm on the day before committee. Any items received on the day of Committee will be reported verbally to the meeting

Item No.	Application No.	Originator:
5	17/01033/EIA – Footbridge Farm, Tasley	Public Objections

Since the Committee report was finalised, 27 further public objections have been received, summarised as follows:

- Chicken welfare and cruelty issues
- Odour impact on residential areas and Park and Ride
- Impact from debris from the farm on residential areas
- Impact from dust particles, containing aerialised faeces, chicken dander (dead skin), mites, bacteria, fungal spores, mycotoxins, endotoxins, veterinary medicines, pesticides, ammonia and hydrogen sulphide
- Disease risk
- Impact on health; will exacerbate asthma
- Will cause a build up of bacterial resistance which is carried by flies from chicken farms to humans
- Impact on tourists
- Existing adverse odour from the livestock auction
- Negative impact due to greenhouse gases
- Does not bring significant economic benefits to the area; would only create 1.5 jobs
- Impact on hundreds of new houses to be built in Tasley area
- Affordable housing proposed nearby will never be built due to impact
- Traffic impact
- Shropshire should be supporting innovative, plant-based environmental applications instead
- Public are not in favour of this type of application
- Will cause anti-social behaviour around the farm costing Shropshire further fees
- Very little benefit to the farm; negative impacts outweigh benefits
- Mistake to allow cheap meat product on our doorstep

Item No.	Application No.	Originator:
5	17/01033/EIA – Footbridge Farm, Tasley	Applicant's odour consultant

In response to three specific queries from a Bridgnorth Town Councillor, the applicant's odour consultant, AS Modelling & Data Ltd., has provided the following response.

Question 1: What is the likely range of crop cycles? Can the odour modelling be extended to assess the impacts of different likely potential crop cycles? (This may impact the 2 nearest receptors to the 3 OEu/ Cu. M. contours at Footbridge House and Leasowes Farm).

Response from AS Modelling & Data Ltd.:
It is uncommon for crops to extend beyond 38 days in modern broiler rearing (unless the site is specifically rearing bigger birds) and the tendency is for shorter crops. However, it is longer crops which should really be the concern, not shorter crops. Although with shorter crops there would potentially be more clearing out days and consequently more

risk of acute odour episodes, the real issue is with emissions after around the third week of the crop, so the shorter the period between day 21 and the end of the crop, the less potential there is for chronic high emissions.

Question 2: Given the proximity of SAMDev allocated sites to the proposal, it may be appropriate to consider whether there would be occasional exposure to odour concentrations above 3 OEu/ Cu. M. at those sites. Would it be possible to identify the 3 OEu/ Cu. M. contour for (say) the 99.5th percentile?

Response from AS Modelling & Data Ltd.
A table with predicted 99.5th and 99.8th percentiles is provided below. Receptors are as the Revised odour report dated 25th April 2017.

Receptor number	X(m)	Y(m)	Maximum annual hourly mean odour concentration (ou_E/m^3)		
			98thpercentile	99.5thpercentile	99.8thpercentile
1	369335	293332	8.36	16.35	21.84
2	369170	293563	2.61	4.99	6.23
3	369591	293146	2.10	3.94	4.99
4	369716	293213	1.36	2.87	3.95
5	369921	293334	0.83	1.60	2.17
6	369662	293885	0.65	1.20	1.73
7	369208	293907	0.97	1.93	2.64
8	370051	293519	0.57	1.23	1.67
9	368921	293805	0.68	1.68	2.27
10	368576	293610	0.49	1.21	1.85
11	368754	292784	0.58	1.63	2.35
12	368871	292675	0.53	1.41	2.46
13	368626	292621	0.34	1.08	1.89
14	369807	293906	0.55	1.10	1.63
15	369665	294042	0.52	0.97	1.70
16	369652	293494	1.32	2.60	3.50
17	369763	293671	0.79	1.70	2.38
18	369755	293389	1.20	2.17	3.14
19	369761	293146	1.26	2.63	3.34
20	369746	292924	1.03	2.10	3.10
21	370038	293686	0.52	1.03	1.67
22	370084	293056	0.57	1.48	2.29
23	369986	292747	0.52	1.07	1.58

Question 3: Can a meaningful answer be given to the question of what odour impact there would actually be on residents of Bridgnorth and Tasley? For example, could the 1 OEu/ Cu. M. (sometimes described as the limit of detection in laboratory conditions) contour be calculated and the significance of the various levels of odour concentrations be described for the benefit of residents?

Response from AS Modelling & Data Ltd.
This is rather a difficult question, however, I'll try my best. It should be noted the following assumes a normal physiological (nasal) sensitivity, some people may have very sensitive noses, some may have very little sense of smell. Emotional sensitivity (for a

variety of reasons) can also be a factor in how people sense smell.

With a predicted 98th percentile hourly mean odour concentration of 3.0 ouE/m^3, detectable odours would be encountered around 2% of the time; since poultry odours are rather noticeable and levels are likely to fluctuate around the average concentration, the levels of detection in the environment is probably lower than an average hourly mean of 3.0 ouE/m^3, so if anything, it is likely to be more than 2% of the time that odours would be detectable. With a predicted 98th percentile hourly mean odour concentration of 3.0 ouE/m^3, peak hourly means might on occasion reach levels which would be described as moderate in strength. Odour at levels describable as strong might be experienced, but this would probably be rare. Above 3.0 ouE/m^3 at the 98th percentile, the IAQM guidance on impact of odours on amenity would describe the impact as Moderate Adverse.

With predicted levels between 1.5 ouE/m^3 and 3.0 ouE/m^3 at the 98th percentile, detectable odours would occur less the 2% of the time and although levels might reach levels which would be described as moderate in strength, this would be an infrequent or rare occurrence. Strong odours would most likely not be encountered. In this range, the IAQM guidance on impact of odours on amenity would describe the impact as Slight Adverse.

With predicted levels between 0.5 ouE/m^3 and 1.5 ouE/m^3 at the 98th percentile, detectable odours would be uncommon, or even rare and unlikely to be more than feint if they occur. IAQM impact of odours on amenity would describe the impact as Negligible.

With predicted levels below 0.5 ouE/m^3 detectable odours would be rare.

Item No.	**Application No.**	**Originator:**
5	17/01033/EIA – Footbridge Farm, Tasley	Bridgnorth Town Council

Objects to the application.

Bridgnorth Town Council unanimously strongly oppose the application for the following reasons:

1. In view of the sensitivity of this application and the concerns expressed by residents, Bridgnorth Town Council supports the request from Tasley Parish Council that the environmental information submitted be independently reviewed.

2. Bridgnorth Town Council considers that the following concerns warrant refusal of the application as currently presented.
2.1. Compliance with policy CS5 (Countryside and Green Belt).
2.1.1. In relation to this proposal, the relevant policy implication appears to be:
"New development will be strictly controlled in accordance with national planning policies protecting the countryside and Green Belt. Subject to the further controls over development that apply to the Green Belt, development proposals on appropriate sites which maintain and enhance countryside vitality and character will be permitted where they improve the sustainability of rural communities by bringing local economic and community benefits, particularly where they relate to..... Agricultural/ horticultural/ forestry/ mineral related development, although proposals for large scale new development will be required to demonstrate that there are no unacceptable adverse environmental impacts" (Explanatory note: 4.74 Whilst the Core Strategy aims to provide general support for the land based sector, larger scale agricultural/ horticultural/ forestry/ mineral related development, including livestock production units, poultry units, greenhouses/ poly tunnels and mineral extraction, can have significant impacts and will

not be appropriate in all rural locations.)
2.1.2. The Town Council notes that the proposal would generate 1.5 full-time jobs.
2.1.3. There is no clear statement of why the proposed development is appropriate for this particular location, other than current ownership, and that consideration needs to be given to appropriateness of the location in view of the potential significant impacts of such a development close to the settlement boundary of a large Town.
2.1.4. There is limited availability of arable land locally suitable for the spreading of manure due to the site's location immediately adjacent to a built up area, and the proposal involves the transport of manure to distant locations under production by the applicant and to as yet unidentified locations. This casts doubt upon the suitability of the location.
2.1.5. The development is located close to an existing employment site (Bridgnorth Livestock Market), residential areas of Tasley, and areas which have been scheduled for development under SAMDev. The proximity of proposed development to sites allocated for future housing and employment development may be considered to reduce the desirability of the neighbouring sites for future development and to jeopardise their viability. This suggests that this type of development may be inappropriate at this location.

2.2. Compliance with policy CS6 (Sustainable Design and Development Principles)
2.2.1. The policy sets out a basic objective and a number of actions which Shropshire Council will take to achieve the objective. The basic objective is "To create sustainable places, development will be designed to a high quality using sustainable design principles, to achieve an inclusive and accessible environment which respects and enhances local distinctiveness and which mitigates and adapts to climate change."
2.2.2. One of the detailed statements is that this will be achieved by "Requiring all development proposals, including changes to existing buildings, to achieve applicable national standards, or for water use, evidence based local standards as reflected in the minimum criteria set out in the sustainability checklist. This will ensure that sustainable design and construction principles are incorporated within new development, and that resource and energy efficiency and renewable energy generation are adequately addressed and improved where possible. The checklist will be developed as part of a Sustainable Design SPD".
The application does not appear to address energy efficiency and we note that it does not address the potential for renewable energy generation through solar panels.
2.2.3. A further detailed statement is that the policy will be achieved by ensuring that all development "Is designed to be adaptable, safe and accessible to all, to respond to the challenge of climate change and, in relation to housing, adapt to changing lifestyle needs over the lifetime of the development in accordance with the objectives of Policy CS11".
The stated design life of the buildings is 50 years but the application does not appear to address adaptability (for example, in the event of changes in practices in the poultry industry) or the effects of climate change.
2.2.4. The policy requires that all development "Protects, restores, conserves and enhances the natural, built and historic environment and is appropriate in scale, density, pattern and design taking into account the local context and character, and those features which contribute to local character, having regard to national and local design guidance, landscape character assessments and ecological strategies where appropriate"
We do not consider that the development protects, restores, conserves or enhances the natural environment. In particular, although the application includes a landscape character and visual impact assessment it does not clearly demonstrate (e.g. by modelling views) what the visual impact of the proposal would be.
2.2.5. The policy requires that all development "Contributes to the health and wellbeing of communities, including safeguarding residential and local amenity and the achievement of local standards for the provision and quality of open space, sport and

recreational facilities." There are several concerns over whether the proposal either complies or has been demonstrated to comply:
- There is no obvious positive contribution to the health and wellbeing of the settlement of Bridgnorth, and there are concerns over potential negative impacts (albeit that many of those concerns are related to activities which would be controlled by the environmental permit regime).
- There is the potential for adverse health impacts from dust emissions, which could require the submission of a risk assessment to the Environment Agency and may require mitigating measures to be adopted. The applicant has not quantified dust emissions or dispersion. This issue is addressed in the Environment Agency's EPR 6.09 Sector Guidance Note for Intensive Farming, Chapter 11. In many locations it would appear not to be necessary to do so unless there are sensitive receptors within 100m of the site. However, the guidance does suggest that achievement of the PM10 objectives should be related to existing background levels and notes that "Poultry sheds located in rural areas where background levels are relatively low are less likely to exceed the AQS objective than poultry sheds located near urban areas and busy roads and motorways where levels of PM10 are already quite high". The site is located within approx. 310m of the A458, roughly 500m of Bridgnorth Livestock Market, 650m from the commencement of the built up area of Tasley at the western extremity of the Wenlock Rise estate, and roughly 2 km from an existing Air Quality Management Area at Pound Street, Bridgnorth. This may indicate that background levels of PM10 should be ascertained and the impact of emissions from the poultry units considered alongside the background levels. Concerns expressed by local residents also suggest that PM2.5 emissions should be considered.
- The proposal involves the generation of chicken manure, which is proposed to be used as a fertilizer both in the locality and through export to other locations. Manure spreading on the locality could be detrimental to the residential amenity of Tasley and Bridgnorth. In particular, one of the locations at which it is proposed to spread manure (field 2078, sheet SO7093) is immediately adjacent to existing housing. Spreading at this location could not be considered good practice and in any event the field is scheduled for housing development as part of SAMDev site BRID020a and may not be available longer term.
- Odour management has been considered, in relation to emissions from the Poultry sheds only. The spreading of litter on fields in the locality would provide additional and contemporaneous sources of odour emission. We do not consider that this should be regarded as separate from the day to day operations of the poultry houses and the overall impact on residential and local amenity should be considered. Further, consideration should be given to any existing background levels of Ammonia.
- Biosecurity is a potential concern. It must be assumed that the operation of the site and transport of birds and manure would be carried out in a manner which seeks to prevent the flock's exposure to pathogens and the distribution of any. However whilst the risks may be normal for this type of activity and managed accordingly, the consequences of any breakdown in biosecurity could be greater than would be experienced in other locations. Sensitive locations nearby include the resident human populations of Tasley and Bridgnorth, Bridgnorth Livestock market and its lairage, and the flock of utility White Wyandotte chickens at Boars Head Farm (which is the only breeding flock of this species in the world and as such is an important and irreplaceable reservoir of genetic material).
- Residents have expressed concern over the potential for increased levels of flies and vermin. It is understood that these would be site management issues, particularly in relation to the storage of used litter prior to its use as fertilizer. The operation would produce in excess of 2,000 tonnes of used litter a year; it is understood that this would be loaded directly onto vehicles for transport offsite prior to eventual usage as fertilizer, but it is not clear where litter which is proposed to be used at Footbridge Farm and nearby holdings would be stored.. This storage is stated as required to be sheeted, but there are no indications as to where on site the storage would take place. This should be stated and consideration given to a condition about the storage of the material.

2.2.6. The policy requires that all development "Is designed to a high quality, consistent with national good practice standards, including appropriate landscaping and car parking provision and taking account of site characteristics such as land stability and ground contamination"
Whilst the proposal does include landscaping, there is no clear statement of how this will mitigate the visual and landscape impact (or contribute to dust and odour management) and it is thus not possible to determine whether this is optimal.
2.2.7. The policy requires that all development "Makes the most effective use of land and safeguards natural resources including high quality agricultural land, geology, minerals, air, soil and water".
We note that the site appears to be Grade 3 farmland, which would normally be considered "High quality".

3. The Council requests that consideration be given to clarifying the explanatory note (4.74) to policy CS5 to explain the basis for identifying rural locations where "larger scale agricultural/ horticultural/ forestry/ mineral related development" may not be appropriate, or adopting appropriate supplementary planning guidance in relation to such development close to a settlement boundary, during the current Local Plan Review.

Item No.	**Application No.**	**Originator:**
5	17/01033/EIA – Footbridge Farm, Tasley	Applicant's agent

The applicant's agent has submitted further information in relation to water and energy usage:

Water usage including drinking water for birds and washing out = 34.2m^3 per day or 12,483m^3 per annum. This will be provided by a mains supply, or a private borehole supply with the latter being subject to water quality testing and abstraction licensing from the Environment Agency.

There are relatively new technologies available to line the attenuation pond, and provide water treatment works on the site in order to use the roof water as drinking water from the birds. This would however, require a further planning application should the applicant wish to implement such a scheme, as additional infrastructure would be required in the form of a treatment plant building and pump rooms.

The site has the following energy requirements:
- Electricity usage = 300,000 kwh per annum;
- Heat Requirement = 1,200,000 kwh per annum.

The entire heating requirement for the site will be provided by a biomass boiler, and therefore, the current proposal include 80% of the energy requirements from on site renewable provision.

Should the LPA require further renewable technologies, solar panels could be provided on the site.

Item No.	**Application No.**	**Originator:**
5	17/01033/EIA – Footbridge Farm, Tasley	Public Protection Officer

The Council's Public Protection Officer has made the following comments in relation to potential dust impacts:

In relation to dust I think it is worth noting that particulates less than 10 microns in

diameter, known as PM10s, and can have an impact on health. For this reason there is a Local Air Quality Management (LAQM) Regime in the UK which directs local authorities to look at the potential for exceedances of PM10 concentrations set in legislation. The latest guidance and technical documentation associated with this regime is LAQM Technical Guidance Document 2016. Within this document it sets out a procedure to follow to consider if a poultry farm is likely to result in an exceedance of the legislative levels of PM10s. It states that poultry operations should be considered when there are residential properties located within 100m of the nearest ventilation point on the poultry units and the total number of birds to be housed exceeds 400,000 birds where there is mechanical ventilation. As these parameters are not met by the proposed poultry development in question I do not consider it likely that PM10s will exceed legislative levels at any residential receptor as a result of the proposed development.

Item No.	**Application No.**	**Originator:**
6	17/01380/FUL – Jenny Knoll, Woodside, Clun	Planning Officer

An additional condition is recommended:

No more than 6 yurts shall be on the land at any time and no other form of camping structures shall be erected/placed on the land.

Reason: To define the permission for the avoidance of doubt and in the interests of visual amenity and highway safety.

Item No.	**Application No.**	**Originator:**
6	17/01380/FUL – Jenny Knoll, Woodside, Clun	Public Objections

1 additional objection letter received making the following comments:
- Clun is a quiet location and proposal will increase traffic.
- Roads leading to Woodside very narrow and one includes a ford.
- Unnecessary development devalues the natural beauty of the area.
- Shropshire Council should support Clun Town Council's objection.