

05/04/2020

Reference: 2020/0287/MAF

Proposal: Erection of a poultry building for rearing free range hens (re-submission of 2019/0635/MAF)

Address: Land to the east of Cottesmore Road, Market Overton, Rutland

Case Officer: Nick Hodgett

Dear Mr Hodgett,

I am writing to you to object strongly to the above planning application to erect a rearing shed for free-range hens in Market Overton.

The proposed site is located only 300 metres south of our own site.

The Lodge Trust has been established in the community since 1984 supporting adults with learning disabilities and we must look after the interests of our thirty residents with learning disabilities, most of whom are unable to object individually in writing, whose quality of life would very likely to be diminished by the proposed development.

In addition to our offices and residents houses we have horticulture, woodwork, craft and enterprise buildings. We have a café, Country Park and a children's play area (in partnership with MOPA) for the benefit of the community and visitors. Finally we have registered camping and caravanning sites and holiday lodges, which make a contribution to the local tourism industry and provide valuable employment opportunities. This is all designed for our residents to have a peaceful and pleasant place to live and meaningful work to do, enriching their lives and those members of the public who use these facilities.

In comparison with this proposed development which will employ one full time and one part time employee, we are a significant local employer, employing 75 full and part-time people. We also support many local suppliers and we attract hundreds of people each year to our site.

Twice a year in November and May we hold community sale and family fun days where we sell craft and horticulture products produced by our residents and staff. This is an important part of our work and an expression of our commitment to being an active part of the local community. It also raises much needed income.

We contend that all of this would be adversely affected by this proposed development.

Our primary concerns are noise and odour, particularly with regard to the effect this will have on our residents, business and charitable operations. However we are also concerned about other possible impacts such as increases in local fly and rodent populations and light pollution as a result of this proposed development.

Distress caused to our residents may be exacerbated in our case by autism, which is known to cause heightened sensory sensitivity leading to stress, anxiety and possibly physical pain, leading to withdrawal and challenging behavioursⁱⁱ.

Before detailing our concerns I'd like to comment on the applicants Design Access Statement - section 11 which selectively quotes from the NPPF in support of their proposed development.

I'd like to draw your attention to Paragraphs 181 and 182 of the NPPF and ask you to also consider them in relation to this proposal.

- **181.** Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
- **182.** Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities... Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.

Noise

- Independent Assessment
 - We assert that there needs to be an independent noise assessment study done which doesn't just measure decibels but considers the concept of soundscape which considers the subjective reception of the sounds in the context of the environment.

As noted in the Plant Noise Assessment document 4.1 Survey observations;

*"During the setting up and collection of the noise monitor it was observed that the noise sources affecting the local area were local and distant road traffic and birdsong. The general underlying noise environment was considered to be **very quiet**." (Emphasis mine)*

I have no idea what birdsong adds to the background noise in terms of decibels, however this ought to be discounted. We reject any assertion that considers birdsong and the noise of industrial fans, Lorries and power washers as having equivalence when assessing the noise impact of this proposed development. We expect to hear birdsong and it might have a decibel value, but it belongs here, and doesn't impact our well-being in the same way as decibels produced by Lorries, fans and power washers.

- Accuracy and Completeness of the submitted reports
 - In the Plant Noise Assessment document, I note vague statements like 'The majority of modern extract fans are not expected to be tonal'. There is also a 0dB correction for intermittency, but then it's acknowledged there could be circumstances where this might not be true. There are calculation tolerances etc.
 - There will be just short of 500 movements of HGV Lorries over a year with peak movement of 20 Lorries per week, 3 times a year for removal of the birds. I can see no assurance that these movements will be limited to the working day and so assume night time movements of Lorries will occur.
 - For a total of 6 weeks a year (3 x 2 weeks) the sheds will be being cleaned by industrial power washers and the noise implications of this is significant. Again I can see no assurance this activity will not occur at night.
 - The experiences of other people who live close to this type of plant note the significance of additional noise such as the noise the Pullets make when they are being loaded into the Lorries and the constant and intrusive noise of the power washers being used constantly between cycles. Neither of these noise generating activities appear to be referred to in the Plant Noise Assessment.

- Fan noise
 - There is a proposed unobstructed noise path for the 16 main roof fans to our property.
 - Whatever the type of fans and their characteristics, over time they will wear and start producing a higher volume of noise and variations in frequency of vibration than their original design specification.
 - The adjustments in the calculations made for the fan noise assume there is no tonality but as noted in the report itself this is not certain but simply 'not expected' in the 'majority' of modern extraction fans. If the wear factor noted above is added, the frequency of tonality produced could potentially be heard at some distance and could be particularly disruptive at night.
 - Maximum use of the 21 fans will be during spring and summer months when the temperature is highest and when the camping, caravanning and cabins are in maximum use and visitors together with residents may well be sleeping with windows open for ventilation.

- Conclusion
 - In essence, we say that building this development in a very quiet rural location within 300m of a care home, holiday let and camping, caravanning and country park location where our residents live and visitors come to relax and peacefully enjoy the countryside, makes it inconceivable that we will fail to experience a significant and disruptive level of noise from this proposed development leading to a significant loss of amenity. Apart from the potential impact on our autistic residents, it's very likely that even a very small number negative reviews online on holiday review sites regarding noise would seriously damage our reputation among our regular clientele and significantly reduce the likelihood of repeat and new bookings. We assert that this is very likely to happen should this proposed development go ahead.

Odour

- Independent Assessment
 - We would assert that there needs to be an independent odour impact study done.
- Experience of others in close proximity to similar plants
 - One lady living 235 metres from a similar farm, who was interviewed by the Bureau of Investigative Journalism, remarked on how it had made her life "very difficult". She was especially disturbed by what she described as "a horrible sweet sickly smell" from the ventilation chimneys and now prays for north windsⁱⁱⁱ.
- Variable Conditions
 - Considering the variability of wind direction, any assertion that the prevailing wind is not in our direction is far from sufficient to assuage concerns about offensive odour and is nevertheless not supported by evidence. At any time, but particularly during warm spring and summer days the prevailing weather conditions could easily mean the odour could envelop our site.
- Impact
 - Distress caused to our resident's quality of life may be exacerbated in our case by autism as explained above. They would also be impacted indirectly by the loss of earnings from our business which is used to supplement the charity's income so that a workplace can be maintained and a variety of activities offered.
 - Specifically, customers staying in our self-catering log cabin holiday lets and on our caravan pitches and visiting our café may be deterred. A bad smell lingers long in the memory. It's very likely that even a very small number negative reviews online regarding a bad odour would seriously damage our reputation among our regular clientele and significantly reduce the likelihood of repeat or new bookings.

Ultimately this might lead to closure of the Café and Country Park and subsequent job losses.

- Conclusion
 - As per my comment above regarding noise, it's inconceivable in our view that we will fail to experience on occasions a significant and disruptive level of odour from this proposed development.

We trust that our objections will be taken into account when this application is determined. It is our hope that it would at least proceed to a committee where we would have a voice to effectively represent our interests and especially those of our residents.

Yours faithfully,

Ramsey J. Pigott

Chief Executive

ⁱ Page 6 - DESIGN__ACCESS_STATEMENT_-_REDACTED-1075652

ⁱⁱ <https://www.autism.org.uk/about/behaviour/sensory-world.aspx>

ⁱⁱⁱ <https://www.thebureauinvestigates.com/stories/2017-07-21/megafarms-conflict-communities>