

**DC/21/06824 – Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development (EIA Development). Land at Fennings Farm, Pixey Green, Stradbroke, Suffolk.**

Stradbroke Parish Council notes that since its original response to the consultation on the above application further reports and consultation responses have been uploaded to the planning portal. Although the Parish Council has not been re-consulted on this application, the Parish Council would like to submit this additional statement.

The Parish Council maintains its previous objection and recommendation.

The Parish Council notes that the Built Heritage Consultant for Place Services does not find that the proposed development enhances or preserves the positive element of the setting of the nearby heritage asset, Grade II Listed Old Hall Cottage which is contrary to paras 200 and 206 of the NPPF. The Parish Council also notes that the Consultant believes that the negative impacts of the scheme could not be successfully mitigated.

The Parish Council highlights that a number of the concerns previously raised have not been addressed in the updated reports, namely:

**1. Water**

- a. The covering letter submitted with the updated Environment Statement states the development would not require a new supply, however this does not address the matter as the Water Cycle Study for Babergh and Mid Suffolk states: *“ESW commented that the supply headroom in its Hartismere Water Resource Zone (WRZ) has now been exhausted by new non-household demand and so this would affect future non-household development”*. The additional reports do not address the increased demand for water in this non-household development.
- b. The applicant’s agent also states that: *“this is before any additional provision via rainwater harvesting”*. The Parish Council can find no reference in the submitted documents to rainwater harvesting. The flood risk assessment prepared in June 2021 by Plandescil identifies on p.18, point 6.6, that surface water runoff from the proposed hardstanding (2.071ha including roofs, yard, and access) will discharge into an attenuation system which will outfall into the ditch on the northern boundary of the site via a flow control. In addition, the report identifies on p.17 that *“rainwater harvesting could be provided, however due to the end use, the re-use of the water is unlikely”*.

**2. Odour**

- a. P.14 of the submitted Odour Assessment notes at point 3.6.5 that the odour impacts during the clear out periods were not represented within the model used to determine whether there would be any impact on the surrounding properties. This includes the odour emissions that will be generated by the application site either as part of this application or for the site as a whole once fully developed.
- b. P.35 of the Transport Assessment shows that the clear out process for the proposed 6 sheds will take place over 2 days, this combined with the days required to clear the existing 9 sheds could mean the highest level of odour emissions could be reached on a considerable number of days in every year, yet has not been modelled. Therefore, given that peak emissions are likely to be significantly higher than at other times it is necessary for the applicant to provide details about

the upper limits of these emissions in order for the impacts of the clear-out process of the sheds to be assessed.

- c. The odour assessment accepts that the clear out process will result in increased odour emissions, therefore this should be assessed for the days covering the 7 to 8 clear outs required per annum. As it is not fully assessed, it is therefore not certain that Policy CL17 will not be breached as there is no evidence that there will be no materially detrimental effect on nearby residential amenity. In addition, there is no reference to the scale of odour emissions that may arise over the full rearing cycle or over the different times of the year.
- d. East Suffolk Council commissioned an independent review of an odour impact assessment submitted to support a planning application for 3 poultry units, this review has highlighted flaws in the methodology of that report which the Parish Council feel are also reflected in the methodology used to prepare the odour report submitted in relation to this application.
- e. The applicant's agent has pointed out the responsibility for odour management rests with the Local Planning Authority. Therefore the Parish Council would urge officers to carry out the same rigorous investigations as East Suffolk Council to verify the outcomes of the submitted odour report. Once this has been undertaken the views should be sought of Mid Suffolk's Environmental Protection Officers on the potential detrimental effect on nearby residential amenity of the peak emissions during clear out days and the increased emissions through the growing cycle and the impact these would have over the course of the year.
- f. Odour assessment: on pages 10 & 15, footnotes 12 & 14 reference IPPC SRG 6.02 (Farming) - Odour Management at Intensive Livestock installations, EA, 2003 – this guidance does not contain the information referenced on the pages. Mid Suffolk officers will need to ensure that the correct guidance has been evaluated and referenced.

### **3. Waste (litter and water)**

- a. The agent's covering letter for the environmental statement highlights on p.1, 3<sup>rd</sup> bullet point, that there is a letter of undertaking from the applicant in relation to the muck arising and an upcoming contract with Melton Renewable Energy UK Limited. The attached letter states the following: *"Please accept this letter as confirmation of our intention to send all muck generated from the proposed poultry houses..... for use in the generation of electricity at either Eye or Thetford ...."* The applicant goes on to qualify this statement with another as follows: *"Although the specific destination of the muck remains a commercial decision subject to future contract negotiations ...."*
- b. The statements above from the applicant do not prevent spreading of the waste nearby the site should that become more convenient or economic. Odour and dust impacts from the spreading of the waste are therefore a foreseeable indirect effect of the proposed development in the absence of a condition or planning obligation ensuring that the waste will in fact be delivered to Eye or Thetford Power Stations. Particularly given that the permitting documents previously submitted by the Parish Council show the intention for the disposal of litter is as follows: *"At the end of the rearing periods after chickens have been removed, the litter will be removed and exported off-site in covered trailers for spreading on land owned by a third party to confer agricultural benefit or supplied to a local power station as fuel."*

- c. The Parish Council notes from documents submitted to East Suffolk Council that the Environment Agency make explicitly clear that the amenity impacts arising from waste management are to be dealt with by the Local Planning Authority.
- d. The recently submitted documents do not address the issue of disposal of waste water and therefore the Parish Council reiterates the following:
  - i. The Transport Assessment in Table 4.1 on p.14 states that there will be 2 x artic of waste water per cycle (7.5 cycles per annum). Each load carries 30,000 litres (p. 34 Annex E Transport Assessment) giving an annual total of 450,000 litres of waste water.
  - ii. Point 6.18 (p.43) of the Environment Statement states that the waste water from cleaning the units will be taken from site in sealed tankers – the report is silent on the destination of the waste water.
  - iii. As part of the submitted EA permitting documents it is stated that: *“Dirty water spread on land under the control of a separate farming business and a written agreement is in place.”*
  - iv. None of the documentation submitted identifies where the separate farming business is situated and there is no evidence submitted that the waste water would be treated or that the spreading of waste water on land would not have a detrimental environmental impact.

#### 4. Highways

- a. The Parish Council notes the copies of recent correspondence between the applicant’s agent and Suffolk County Council Highways in which the holding objection has been removed.
- b. The Parish Council notes from this correspondence that Suffolk County Council Highways stated the following: *"The impact upon the B1118 in Stradbroke is a greater concern but as this forms part of the Suffolk Lorry Route network and not all of the (modest number of) HGV journeys involve this route, it is something we will have to accept."*
- c. The Parish Council continues to seek reassurance from both Mid Suffolk and Suffolk County Councils that the risk posed to pedestrians of an HGV mounting the only pavement to enable vehicles to pass each other on the B1118 in the village (Queens Street) has been thoroughly and rigorously reviewed as the emails from highways do not show this to be the case. There is no evidence submitted that this application can mitigate the impact on highway safety of the additional vehicle movements on the B1118, which is not in accordance with NPPF paragraph 110.

Submitted by:  
Stradbroke Parish Council  
16 August 2022

**DC/21/06824 – Erection of 6no. poultry houses with associated admin blocks, feed bins and ancillary development (EIA Development). Land at Fennings Farm, Pixey Green, Stradbroke, Suffolk.**

The recommendation in this report is based on a review of the documentation submitted for this application together with documentation submitted to the Environment Agency in support of a revised permit application. The full review of the relevant matters is submitted on pages 2–6, with the environmental permit application documents attached as appendices for reference.

**Recommendation**

Stradbroke Parish Council **OBJECTS** to the planning application and recommends that Mid Suffolk **REFUSES** the application due to concerns regarding the following planning matters:

1. Essex and Suffolk Water and Mid Suffolk published a statement of common ground in September 2020; this document confirms that the water supply headroom for non-household demand has been exhausted in this area. This application is for a water intensive business and yet this matter is not referenced or dealt with in any of the documentation supporting the application.
2. Waste (litter) – there are differing statements made by the applicant and the company which applied for the environmental permit. Recent court cases demonstrate that it is necessary that the treatment of all litter produced at intensive poultry units should be fully and clearly shown in planning applications – this is not the case with this application where only vague statements are made with no supporting evidence; this fails to satisfy the requirements as laid out in the court cases (Squire vs Shropshire and Keating vs East Suffolk).
3. Waste (water) – as above, the application contains a limited statement on the disposal of the waste water and the permit application does not contain sufficient information on which land the water will be spread and this fails to satisfy the requirements of the court cases.
4. Odour - The Odour Assessment does not quantify the peak odour emissions that will be generated by the application site either as part of this application or for the site as a whole once fully developed. The odour assessment accepts that the clear out process will result in increased odour emissions therefore this should be assessed for the days covering the 7 to 8 clear outs required per annum. As it is not fully assessed, it is not certain that Policy CL17 will not be breached given there is no evidence that there will be no materially detrimental effect on nearby residential amenity.
5. Ammonia - The cumulative and in combination effects of the 6 units in this application, the existing units on the site and Ebdens Farm (only 1km away) has not been modelled, assessed or reviewed. In addition, the full capacity of this application site has not been assessed. It is not clear whether the updated guidance from Natural England published September 2021 has been applied.
6. Stradbroke Neighbourhood Plan – as this is referenced as a site bringing employment, the increased vehicle movements is contra to Policy STRAD13.
7. Highways – It is not clear from the Transport Assessment how the unacceptable impact on highway safety of additional HGVs travelling along the narrow point on Queens Street can be mitigated, this is contrary to NPPF para. 110 and Policies CL15 and CL17. NPPF para. 111 states that applications can be refused if there is an unacceptable impact on highway safety.
8. The correct IPPC guidance on managing units over 40,000 has not been referenced (see point 4.8 below) and it is not clear what impact this would have on the areas mentioned above, further investigation by the parish council is ongoing and the council may submit additional comments once completed.

## 1. Water

1.1 As part of the Joint Local Plan review process Mid Suffolk District Council and Essex and Suffolk Water published a statement of common ground which clarified the following:

*“Water supply.*

*Through the production of a Water Cycle Study for Babergh and Mid Suffolk, ESW commented that the supply headroom in its Hartismere Water Resource Zone (WRZ) has now been exhausted by new non-household demand and so this would affect future non-household development.*

*Outcomes*

*A meeting was held on 22nd September 2020, where ESW confirmed they could meet expected household growth in the Water Resource Management period (2020 to 2025). It was also confirmed that ESW expect to be able to support the relevant proposed overall growth in the Joint Local Plan lifetime through future investment plans. ESW is however unable to provide water in the current Water Resource Management Plan period for new non-domestic processing activities. If uses of this kind were to come forward for development, then the water required would need to be planned for in the next Water Resource Management Plan period (Periodic Review 2024 known as PR24). This would also require investment in infrastructure or water transfer which would unlikely be operational until 2027. In the meantime, and where appropriate, businesses requiring additional non-domestic supplies should consider other options including, but not limited to, opportunities for water recycling.*

*Additional investment can be made by ESW through the next Water Resources Management Plan to further support the planned growth within the Hartismere WRZ.”*

1.2 Intensive Poultry Units are high users of water in terms of drinking water (for the birds) and poultry shed cleaning. On average each bird will consume 1.6ltr of water for every 1kg of feed; this added to the cleaning water required would mean that the 308,000 birds per cycle reared in the 6 units in this application would require water usage of between 11.5 and 15.2 million litres of water per year depending on the amount of feed consumed.

1.3 There is no reference to the matter of non-domestic water usage and how this non-domestic usage is to be mitigated in light of the statement from Essex and Suffolk Water regarding the limited supply in the Hartismere Water Resource Zone, in which this proposed development is sited.

1.4 The matter of water supply was noted at the recent Joint Local Plan hearings by Mid Suffolk officers as being a major issue for future non-domestic applications, such as this one, that come forward in an affected area, which this is.

## 2. Waste (litter)

2.1 P.43-44 of the Environmental Statement covers the treatment of the poultry litter. 6.20 states that the litter will be treated in accordance with the Environment Agency Permit.

2.2 Point 6.21 on p.44 of the Environmental Statement states the litter will go to local power stations, eg Eye or Thetford Power Station, then continues that a contract at this stage is for the majority of the litter to go to Eye Power Station.

2.3 Crown Chicken (part of Cranswick) not the applicant has applied for the environment agency permit and as part of this application Crown submitted an odour management plan stating that most of the litter is used for power generation. Crown also stated that *“any which is land-spread will be under the control of a separate farming business and a written contract is in place”*, however the application fails to identify where this third party land is situated. In response to a request for further information from the Environment Agency, Crown stated the following: *“At the end of the rearing periods after chickens have*

*been removed, the litter will be removed and exported off-site in covered trailers for spreading on land owned by a third party to confer agricultural benefit or supplied to a local power station as fuel."*

- 2.4 The Squire vs Shropshire Council court of appeal case made clear the importance of assessing the treatment of waste when determining the impacts of a poultry development. This appeal decision is supported by the case of Keating vs East Suffolk Council where a planning decision was quashed as the council misinterpreted the Squire case and failed to adequately consider the direct and indirect environmental effects of the waste. Given the statements from the applicant and the company who will be operating the units concerning poultry waste disposal, it is not clear from the information available that this application fully complies with the outcome of the Squire case.
- 2.5 The statements from both the applicant and the operator do not prevent spreading of manure nearby the site should that become more convenient or economic. Odour and dust impacts from the spreading of manure are therefore a foreseeable indirect effect of the proposed development in the absence of a condition or planning obligation ensuring that the waste will in fact be delivered to Eye Power Station.
- 2.6 During the examination of the Joint Local Plan, officers from Suffolk County Council reiterated that it is the Local Planning Authority's responsibility to ensure that all the waste from intensive poultry units is properly managed and dealt with. This includes ensuring capacity is available wherever waste is disposed.

### **3. Waste (Water)**

- 3.1 The Transport Assessment in Table 4.1 on p.14 states that there will be 2 x artic of waste water per cycle (7.5 cycles per annum). Each load carries 30,000 litres (p. 34 Annex E Transport Assessment) giving an annual total of 450,000 litres of waste water.
- 3.2 Point 6.18 (p.43) of the Environment Statement states that the waste water from cleaning the units will be taken from site in sealed tankers – the report is silent on the destination of the waste water.
- 3.3 The operator of the site (not the applicant) has obtained a permit from the environment agency. As part of the submitted documents Crown stated that: *"Dirty water spread on land under the control of a separate farming business and a written agreement is in place."*
- 3.4 None of the documentation submitted identifies where the separate farming business is situated and there is no evidence submitted that the waste water would be treated or that the spreading of waste water on land would not have a detrimental environmental impact.
- 3.5 During the examination of the Joint Local Plan, officers from Suffolk County Council reiterated that it is the Local Planning Authority's responsibility to ensure that all the waste from intensive poultry units is properly managed and dealt with. This includes ensuring capacity is available wherever waste is disposed.

### **4. Odour**

- 4.1 The response from the environmental health team at MSDC appears to show that the team has not reviewed the Odour Assessment report submitted in support of the application.
- 4.2 The Planning Statement at point 1.8 (p.3-4) and point 3.5 (p.9) states that the reasoning for the development is that the additional 6 sheds will take the farm to full capacity.
- 4.3 The Odour Assessment models for 538,500 birds and not the maximum capacity of the site (including the existing 9 units) which is shown as 570,000 (Planning Statement – appendix Environment Agency notice of variation p.2).

- 4.4 P.14 of the submitted Odour Assessment notes at point 3.6.5 that the odour impacts during the clean out periods were not represented within the model used to determine whether there would be any impact on the surrounding properties. This includes the odour emissions that will be generated by the application site either as part of this application or for the site as a whole once fully developed.
- 4.5 P.35 of the Transport Assessment shows that the clear out process for the proposed 6 sheds will take place over 2 days, this combined with the days required to clear the existing 9 sheds could mean the highest level of odour emissions could be reached on a considerable number of days in every year, yet has not been modelled. Therefore, given that peak emissions are likely to be significantly higher than at other times it is necessary for the applicant to provide details about the upper limits of these emissions in order for the impacts of the clear-out process of the sheds to be assessed.
- 4.6 The odour assessment accepts that the clear out process will result in increased odour emissions, therefore this should be assessed for the days covering the 7 to 8 clear outs required per annum. As it is not fully assessed, it is therefore not certain that Policy CL17 will not be breached as there is no evidence that there will be no materially detrimental effect on nearby residential amenity.
- 4.7 The EA permit for the nearby Ebdens Farm intensive poultry units shows the capacity is 252,000 birds. This would mean a combined total number of birds within 1km of 822,000 birds x 7.5 cycles per annum = 6,165,000 birds per annum. However, the cumulative and in combination effects of these two sites has not been modelled, assessed or reviewed.
- 4.8 Odour assessment: on pages 10 & 17, footnotes 12 & 14 reference IPPC SRG 6.02 (Farming) - Odour Management at Intensive Livestock installations, EA, 2003 – this guidance is for poultry units **up to** 40,000 birds therefore is not relevant to this application. Mid Suffolk officers will need to ensure that the correct guidance has been evaluated and referenced.

## **5. Ammonia**

- 5.1 The cumulative and in combination effects of the 6 units in this application, the existing units on the site and Ebdens Farm (only 1km away) has not been modelled, assessed or reviewed. In addition, point 1.2.3 page 1 notes that the capacity modelled for this application is 48,913 per shed, not the full capacity of each shed which would be 51,300 birds per shed, per cycle.
- 5.2 The guidance from Natural England was updated in September 2021 with a 1% in-combination threshold now being applied, it is not clear that this has been taken into account in the documentation submitted.

## **6. Stradbroke Neighbourhood Plan**

- 6.1 The applicant states that the development would result in employment for two full time managers and part time staff (Planning Statement p.13 point 5.5). Section 8 (p.38) of the Neighbourhood Plan concentrates on the economy of the village and paragraph (d) identifies that new employment should not encroach into the open countryside. The development is proposed in open countryside; however this area of countryside is adjacent to existing poultry units.
- 6.2 The Planning Statement at point 5.31 (p.17) references the Neighbourhood Plan and states that the proposal complies with the required criteria within Policy STRAD13. Policy STRAD13 states at bullet point 4 that the activities should not result in significant increase in heavy goods vehicular traffic on the roads in the vicinity of the premises or elsewhere in and around the parish. The applicant has submitted evidence that the proposed development will result in an additional 3870 vehicle movements per annum with a particular increase in HGVs on week 6 of each cycle with 7.5 cycles a year (see Transport Assessment p.14 table 4.1) this represents a significant increase on the present situation on the roads in the vicinity of the proposed development site and therefore does not satisfy the criteria of Policy STRAD13.

## 7. Highways

7.1 NPPF paragraph 110 states that when assessing sites put forward for development it should be ensured that “(d) any significant impacts from the development on the transport network (in terms of capacity and congestion), **or on highway safety**, can be cost effectively mitigated to an acceptable degree.”

7.2 The submitted Transport Assessment states at the 6<sup>th</sup> paragraph to section 4.6 on page 16 that the “... *the B1118 is a two-way carriageway with clear road markings and therefore **two HGV can pass each other safely***”.

7.3 The Environmental Statement at point 5.41 contains a caveat that the ratio of feed from Denham and Kenningall Mills is not guaranteed, therefore this could mean that all HGVs carrying feed could travel from Denham through the village of Stradbroke on the B1118. The additional HGVs carrying feed that will need to pass down Queens Street every year pose a **significant impact on highway safety**. The photos below show that the section of the B1118 (Queens Street) which passes through the centre of the village is **not wide enough for two large vehicles to pass each other safely** as one of the vehicles must mount the only pavement to enable a passing manoeuvre to take place. Due to the routing of HGVs from the mill at Denham, it would not be possible to reroute these HGVs away from the dangerous pinch point.

Note: the red HGV is on the pavement to allow the white HGV to pass.

This photo shows how narrow the B1118 is at points within the village, with HGVs mounting the only pavement to avoid oncoming HGVs.



This photo is taken outside the primary school, some of the houses on Queens Street have no off road parking and the road is used for resident parking making it single width for a large portion within the village.



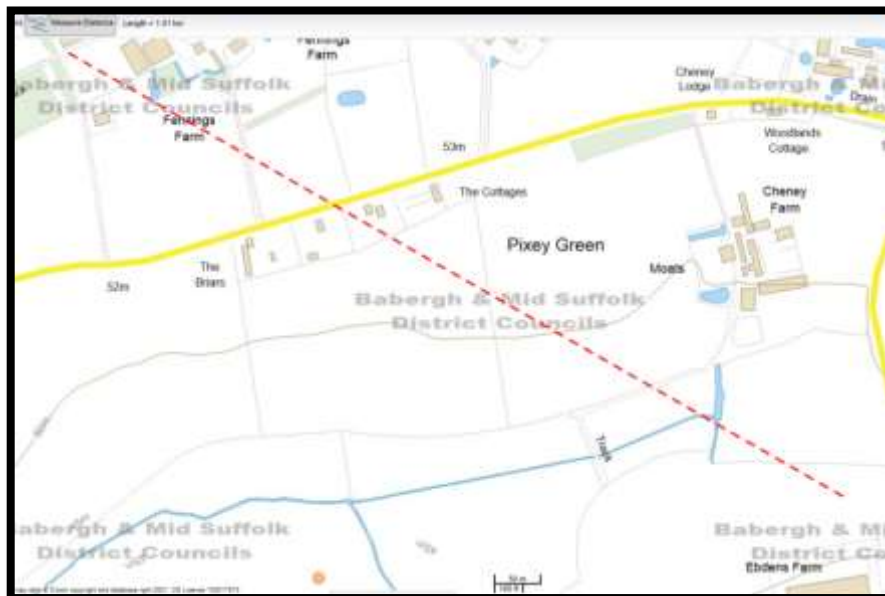
This photo shows the impact on Queens Street of vehicles being unable to pass each other. This photo was taken after the bus in the photo had been stationary for 20 minutes.



7.4 It is not clear from the Transport Assessment how the unacceptable impact on highway safety of additional HGVs travelling along the narrow point on Queens Street can be mitigated, this is contrary to NPPF para. 110 and Policies CL15 and CL17. NPPF para. 111 states that applications can be refused if there is an unacceptable impact on highway safety.

7.5 A report commissioned by County Councillor McGregor and produced by Suffolk County Council in 2019 highlighted that between 1/6/2014 and 1/6/2019 on the Chickering Road section of the B1118 approaching Stradbroke there had been seven collisions at one specific point near the Depperhaugh Nursing Home, with 2 of these resulting in injuries classified as “serious injury”. The report highlighted that the road at this point was dangerous with poor visibility that could not easily be remedied.

7.6 The vehicle movements on the birds out and clean out week, which will occur 7 or 8 times a year, will be significant particularly when viewed cumulatively and in combination with the movements generated by the 9 existing units on the same site and those generated by the nearby 6 units at Ebdens Farm, Pixey Green IP21 5NJ (online mapping tool shows the two intensive poultry unit sites are only 1km apart).



Submitted by:  
Stradbroke Parish Council  
11<sup>th</sup> January 2022

## Fennings Poultry Unit Odour Management Plan

The nature of livestock farming means that preventing odour generation at source is rarely possible as animals are inherently odorous. However, there are many things that can be done, often at low cost, to minimise odour or to prevent it reaching neighbours.

The updated H1 Environmental Risk Assessment submitted with application EPR/BP3633UQ/V006 relating to increasing the installation boundary over land adjacent to Fennings Poultry Unit for development with 6No. houses for rearing poultry, ancillary buildings and drainage and associated structures showed that sources have been identified as contributing to potentially moderate and minor risk of odour. The risk assessment was performed in accordance with EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010; Appendix 4 and the Environment Agency (2011); Additional guidance for H4 Odour Management.

An Odour Management Plan (OMP) has been prepared as part of the environmental management system for Fennings Poultry Unit owing to sensitive receptors within 400 metres including 11 dwellings (excluding a dwelling for the Farm Manager) and commercial premises in Stradbroke Road shown in Table 1 and Figure 1.

### Sensitive Receptors Within 400 metres *(Distances measured on MAGIC Maps)*

| Location                   | Name                   | Postcode | Receptor  | Direction from installation | Distance from boundary metres | Grid reference |
|----------------------------|------------------------|----------|-----------|-----------------------------|-------------------------------|----------------|
| Stradbroke Rd, Pixey Green | Old Hall Cottage       | IP21 5NF | Dwelling  | Southwest                   | 360                           | TM 24473 75410 |
| Stradbroke Rd, Pixey Green | The Chestnuts          | IP21 5NG | Dwelling  | Southwest                   | 345                           | TM 24587 75389 |
| Stradbroke Rd, Pixey Green | C. E. Davidson Limited | IP21 5NH | Offices   | South                       | 30                            | TM 24807 75720 |
| Stradbroke Rd, Pixey Green | C. E. Davidson Limited | IP21 5NH | Workshops | South                       | 0                             | TM 24885 75756 |
| Stradbroke Rd, Pixey Green | Fennings Farm House    | IP21 5NH | Dwelling  | East                        | 75                            | TM 24973 75760 |
| Stradbroke Rd, Pixey Green | North Lane Cottage     | IP21 5NH | Dwelling  | East                        | 210                           | TM 25099 75829 |
| Stradbroke Rd, Pixey Green | The Briars             | IP21 5NH | Dwelling  | South                       | 250                           | TM 24994 75535 |
| Stradbroke Rd, Pixey Green | Unknown                | IP21 5NH | Dwelling  | South                       | 270                           | TM 25067 75562 |
| Stradbroke Rd, Pixey Green | Penny Cottage          | IP21 5NH | Dwelling  | Southeast                   | 300                           | TM 25138 75573 |
| Stradbroke Rd, Pixey Green | No.1 The Cottages      | IP21 5NH | Dwelling  | Southeast                   | 345                           | TM 25199 75598 |
| Stradbroke Rd, Pixey Green | No.2 The Cottages      | IP21 5NH | Dwelling  | Southeast                   | 360                           | TM 25201 75589 |
| Stradbroke Rd, Pixey Green | No.3 The Cottages      | IP21 5NH | Dwelling  | Southeast                   | 365                           | TM 25204 75581 |
| Stradbroke Rd, Pixey Green | North Lane Farm        | IP21 5NH | Dwelling  | East                        | 365                           | TM 25265 75767 |

## Fennings Poultry Unit Odour Management Plan

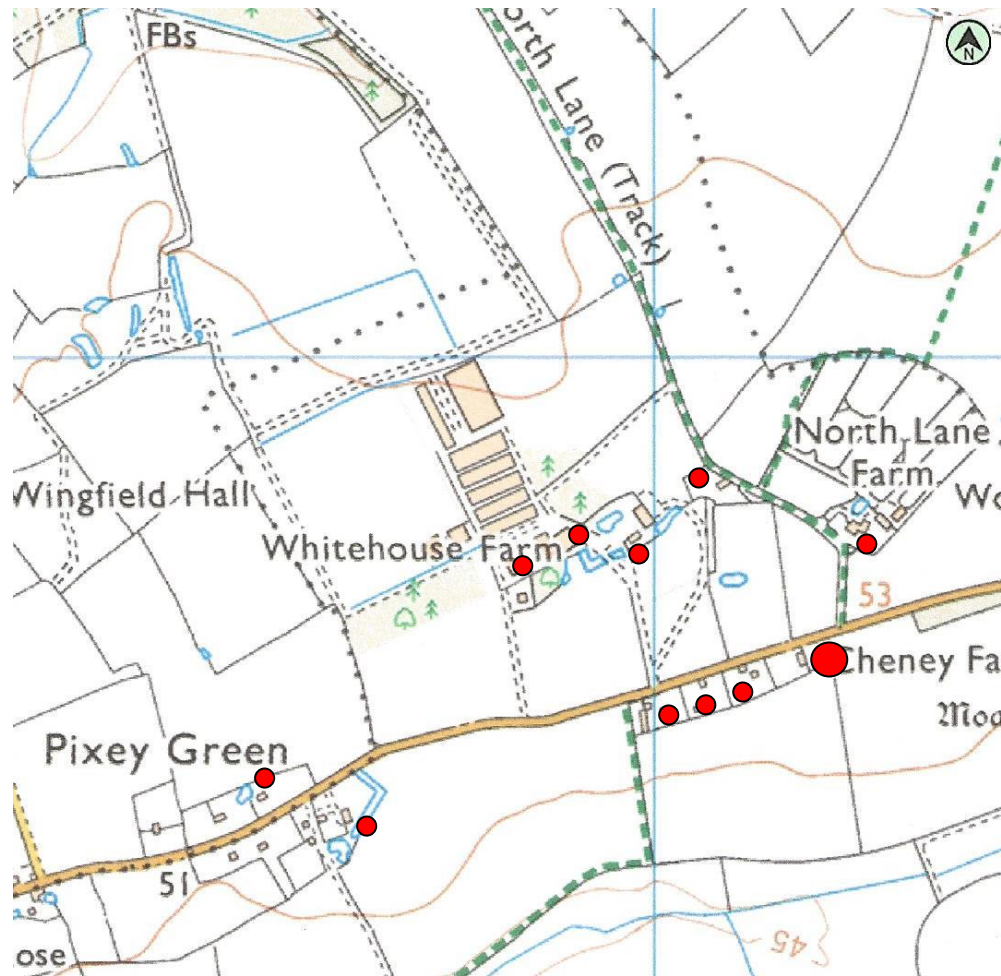


Fig 1. Odour sensitive receptors within 400m Fennings Poultry Unit

Wind direction is defined as the direction from which the wind is blowing. Wind direction will significantly affect how sensitive receptors are affected. According to the Met Office Eastern England climate report - as Atlantic depressions pass by the UK the wind typically starts to blow from the south or south-west, but later comes from the west or north-west as the depression moves away. Directions between south and north-west account for the majority of occasions and the strongest winds nearly always blow from this range. Averaged across the year the wind rose for Coltishall shows that the prevailing wind direction is from the south-west.

All the sensitive receptors are located to the southwest, south and southeast of the installation so are unlikely to be affected most of the time in the prevailing wind, especially in summer when people are more likely to have windows open and to be outside. Sensitive receptors are most likely to be affected when the wind blows from north westerly directions as depressions move away from the UK but occurs less frequently.

The operator has no recollection of any odour complaints or concerns and continues to have good relationships with neighbours.

## Fennings Poultry Unit Odour Management Plan

The following table sets out:-

- The likely sources of odour arising from a typical broiler chicken unit
- The procedures followed or planned at Fennings Poultry Unit in order to prevent or minimise odour levels
- Contingency and emergency planning to limit exposure to elevated odour emissions beyond the installation boundary.

| Odour related issue   | Potential risks and problems  | Actions taken to minimise odour and odour risks at Fennings Poultry Unit   | Completion date |
|---|---|--|-----------------|
| <p>Manufacture and selection of feed</p> <p>According to How to comply, a high protein diet increases the nitrogen and sulphur content of the manure, contributing to emissions of ammonia and other odorous compounds.</p> | <ul style="list-style-type: none"> <li>• Feeds which are unbalanced in nutrients, leading to increased excretion and litter moisture, emissions of ammonia and other odorous compounds.</li> <li>• Poor-quality ingredients.</li> </ul> | <p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010:-</p> <ul style="list-style-type: none"> <li>• No feed manufacturing, milling, or mixing on-site.</li> <li>• Feed specifications prepared and continually monitored by nutrition specialists.</li> <li>• Feed composition closely matched to the chicken’s nutritional requirements. Using multiphase, ad-libitum feeding with a minimum of 4 or 5 nitrogen balanced diets to reduce crude protein in each subsequent stage of growing/production.</li> <li>• Using authorised feed additives to lower crude protein. Adding essential amino acid supplements, non-starch polysaccharide enzymes and phytase to reduce nitrogen excretion.</li> <li>• Feeds supplied from mills in certification schemes only using approved ingredients.</li> </ul> | <p>In place</p> |
| <p>Feed delivery and storage</p>  | <ul style="list-style-type: none"> <li>• Delivery</li> <li>• Spillage/spoilage</li> </ul>   | <p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and the Poultry Industry Good Practice Checklist v2; 2013 and DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Installed package enclosed silos, pipes, augers and feeding equipment to minimise spillages.</li> <li>• Feed silos protected from collision damage by careful siting relative to traffic flows, in between the poultry houses keeping them out of the path of HGVs and provision of concrete kerbs.</li> <li>• Feed delivery vehicles are always covered minimising dust emissions.</li> <li>• Deliveries will be monitored by the driver’s and stockman.</li> </ul>   | <p>In place</p> |

## Fennings Poultry Unit Odour Management Plan

|   |   |  |                 |
|---|---|--|-----------------|
|   |   | <ul style="list-style-type: none"> <li>• Automatic equipment on which chickens depend will be inspected by the stockman not less than once per day to check there are no defects and any defects will be repaired immediately.</li> <li>• Maintaining a preventive maintenance programme &amp; record keeping for buildings and equipment with stockman and professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u><br/>Spillage of feed pellets/chick crumbs outside/inside the poultry houses.</p> <p><u>Timeframe for implementation</u><br/>Immediately</p> <p><u>Emergency action</u><br/>Clear up to avoid dust/odour or wetting/spillage/odour.</p>   |                 |
| <p>Ventilation systems</p> <p>According to the BAT Reference Document - odour from boiler housing is reported to increase in offensiveness with the moisture content of the litter.</p> | <ul style="list-style-type: none"> <li>• Inadequate design causing poor dispersion of odour</li> <li>• Inadequate air movement in the house, leading to high humidity and wet litter</li> <li>• Extraction fans located close to sensitive receptors</li> <li>• Electricity supply disrupted (but electricity outages rarely occur).</li> </ul> | <p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013 and in the DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Forced ventilation installed in all the poultry houses and computer controlled to remove moisture under all weather and seasonal conditions while meeting the physiological needs of the chickens. Regularly adjusting to match the age, the weight and health requirements of the chickens.</li> <li>• Installed high velocity ventilation in all the poultry houses.</li> <li>• Optimising discharge conditions for exhaust air from all the poultry houses using a combination of techniques described in BAT 13 to reduce odour emissions including:</li> <li>• Maximised outlet heights – exhausting air above roof level, air exhaust through the ridge instead of through the walls (BAT).</li> <li>• Increased vertical outlet ventilation velocity having been designed with uncapped outlet cones on all the houses (BAT) with vents greater than 5.5 metres high and fan efflux velocity greater than 7m/s.</li> <li>• Automatic equipment on which chickens depend will be inspected by the stockman not less than once per day to check there are no defects. Any defects will be repaired immediately by the stockman or by professional contractors.</li> </ul> | <p>In place</p> |

## Fennings Poultry Unit Odour Management Plan

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|  |  | <ul style="list-style-type: none"> <li>• Maintaining a preventive maintenance programme &amp; record keeping for buildings and equipment with stockman and professional contractors.</li> </ul> <p>In addition, at Fennings Poultry Unit:-</p> <ul style="list-style-type: none"> <li>• Tunnel fan outlets on poultry houses 3,4,5,8&amp;9 direct air away from sensitive receptors.</li> <li>• Gable end fans installed on poultry houses 3,4&amp;5 and those to be installed on the 6No. newest houses 10,11,12,13,14&amp;15 will direct air away from sensitive receptors – east and westward respectively.</li> <li>• Gable end fans only used when necessary in the warmest weather and switched off as soon as they are not required. Not used at other times or when removing litter or during cleanout.</li> <li>• Well-established vegetation/hedges/shrubs/trees/grass on the site boundary in close proximity to the gable end fans outside all the houses create turbulence in the outgoing exhaust air flow (BAT).</li> <li>• Installed package stand-by generator for automatic back-up if electricity supply is disrupted. Being tested weekly by the stockman to check there are no defects. Any defects will be repaired immediately by the stockman or by professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u><br/>Alarm system installed gives warning of electricity outage, high/low temperature in poultry houses/failure of ventilation equipment</p> <p><u>Timeframe for implementation</u><br/>Immediately</p> <p><u>Emergency action</u><br/>Check stand-by generator/fuel tank operating properly, check ventilation extractor fans/tunnel fans/gable end fans are operating properly or repaired immediately if there may be insufficient air changes to maintain bird welfare/ temperature/keep litter dry. Gable end fans may be used to provide additional air extraction.</p> |  |
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## Fennings Poultry Unit Odour Management Plan

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|  |  | <p><u>Duration of action</u><br/>Until optimum environmental conditions (e.g. temperature, humidity) are restored to meet chicken's needs. Particular care required to switch off gable end fans which might otherwise increase the exposure of the nearest sensitive receptors to odour/dust/noise.</p> <p><u>Cessation of action</u><br/>When electricity supply is restored/equipment is repaired/optimum environmental conditions have been restored.</p>  |          |
| <p>Litter quality</p> <p>According to How to comply, the level of odorant emissions decreases as the quantity of litter per livestock unit is increased - binding nitrogen to reduce odour and ammonia emissions</p> | <ul style="list-style-type: none"> <li>• Insufficient litter</li> <li>• Poor quality litter</li> <li>• Wet litter</li> </ul> | <p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and the Poultry Industry Good Practice Checklist v2; 2013 and DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Insulated all walls &amp; ceilings, preventing air moisture condensation and concrete floors provide insulation preventing air moisture condensation and water ingress.</li> <li>• Bedding material spread in a uniform layer over the entire floor area at start of each growing period</li> <li>• Using a proprietary blend of chopped straw/wood shavings or chopped straw for absorbent bedding - which when mixed with droppings will bind the faeces in the litter and provides a dry area.</li> <li>• Monitoring litter daily, any problems will be rectified, if capping occurs extra litter will be added.</li> <li>• Maintaining a preventive maintenance programme &amp; record keeping for buildings and equipment with stockman and professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u><br/>Moderately offensive odour/litter capping</p> <p><u>Timeframe for implementation</u><br/>Same day</p> | In place |

## Fennings Poultry Unit Odour Management Plan

|   |   |  |          |
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|   |   | <p><u>Cessation of action</u><br/>Optimum environmental conditions are restored (e.g. temperature/humidity/moisture content), litter capping is not spreading.</p> <p><u>Emergency action</u><br/>Check extractor fans are operating properly or repaired immediately to maintain temperature/ventilation/reduce litter moisture content. Add extra litter if capping is not improving.</p> <p><u>Duration of action</u><br/>Continue checking temperature/ventilation/moisture content daily and adding extra litter as required.</p>   |          |
| <p>Drinking systems</p> <p>According to the BAT Reference Document, odour from boiler housing is reported to increase in offensiveness with the moisture content of the litter.</p> | <ul style="list-style-type: none"> <li>• Design</li> <li>• Operation</li> </ul> | <p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and the Poultry Industry Good Practice Checklist v2; 2013 and DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Installed non-leaking nipple drinkers with cups and will be frequently adjusted to bird eye level to avoid spillages and wet litter.</li> <li>• Daily checking of water lines to avoid leaks/capping of litter.</li> <li>• Automatic equipment on which chickens depend will be inspected by the stockman not less than once per day to check there are no defects. Any defects to be repaired immediately by the stockman or by professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u><br/>Moderately offensive odour/wet litter next to drinking lines/litter capping</p> <p><u>Timeframe for implementation</u><br/>Same day</p> | In place |



## Fennings Poultry Unit Odour Management Plan

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|                         |   | <p><u>Emergency action</u><br/>Check and repair any leaks, moving and drying damp litter, adding extra litter if required or when capping is occurring.</p> <p><u>Duration of action</u><br/>Continue checking lines and repairs daily and adding extra litter as required.</p> <p><u>Cessation of action</u><br/>Reduced moisture content of litter in vicinity of any leak/litter capping is not spreading</p>  |          |
| Catching and collection | <ul style="list-style-type: none"> <li>• Odour released via fans and when doors are open to move chickens out.</li> </ul> | <p>Measures are described in Best Available Techniques (BAT) Reference Document; 2017 and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Destocking and collecting chickens end of every growing cycle. Occurs only 6 or 7 times every year and takes only a few days.</li> <li>• The configuration of poultry houses ensures collection vehicles are located in front of the houses on the central concrete hard standing during loading, farthest away from sensitive receptors.</li> <li>• Catching and collecting techniques are designed to minimise bird disturbance and minimise dust and odour including using subdued lighting to keep chickens calm and using a modular handling system.</li> <li>• Reducing catcher’s exposure to dust by keeping doors closed and switching on more ventilation fans to create the required airflow. Releasing and dispersing dust and odour via the high velocity fans.</li> <li>• Chicken modules nearly always covered to protect chickens during transport. Covers provide some barrier to releasing dust and odour, but the modules will be uncovered in warmest weather.</li> <li>• Collection vehicles pass-by some sensitive receptors in Stradbroke Road but takes only seconds.</li> <li>• Keeping the houses closed and locked after destocking to contain the dust and moderately offensive odour.</li> </ul> | In place |

## Fennings Poultry Unit Odour Management Plan

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| <p>Removing litter</p> <p>According to How to comply – odorous compounds may be absorbed onto dust particles and the particles themselves may decompose releasing volatile compounds</p> <p>Generally considered to be dustiest and most odorous activity end of every growing cycle.</p> | <ul style="list-style-type: none"> <li>Releasing odour via the extraction fans and when doors are open to move litter out.</li> </ul> | <p>Measures are described in and EPA 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>Destocking and removing litter end of every growing cycle. Occurs only 6 or 7 times every year and takes only a few days.</li> <li>Professional contractors removing the litter as soon as possible, normally within one day of destocking, and not normally more than 3 days (e.g. destocking on a Friday and cleaning out on Monday). Removing the litter from all the houses will take place in as short a time as possible.</li> <li>Removing litter on normal weekdays avoids causing annoyance at weekends.</li> <li>Clearing build-up of dust deposits from around vents end of cycle.</li> <li>Removing litter from the floor, using a front end or skid-steer loader to shovel the bulk of the litter carefully and directly from the floor into a waiting lorry/trailer positioned outside the doors to avoid double handling. The doors will be open on to the central concrete hard standing where the contractor's lorries/trailers will be parked, so not in close proximity to sensitive receptors.</li> <li>Vehicles/ trailers will be kept covered unless loading.</li> <li>Collection vehicles will pass-by some sensitive receptors in Stradbroke Road but takes only seconds.</li> <li>Most of the litter is used for power generation and any which is land-spread will be under the control of a separate farming business and a written agreement is in place.</li> <li>Keeping houses closed and locked after removing litter to contain the dust and moderately offensive odour.</li> <li>No used litter will be stored on site.</li> </ul> <p>In addition, at Fennings Poultry Unit:</p> <ul style="list-style-type: none"> <li>Reducing contractor's exposure to dust by keeping doors closed and switching on more fans to create the required airflow and disperse dust and odour via the high velocity fans. Gable end fans not used to avoid exposing sensitive receptors to dust and odour.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u></p> | <p>In place</p> |
|---|---|--|-----------------|



## Fennings Poultry Unit Odour Management Plan

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|          |  | <p>Strong northerly winds spreading dust/moderately offensive odour into the gardens of the nearest sensitive receptors in Stradbroke Road, although northerly winds are less common in summer when people are more likely to have windows open and to be outside.</p> <p><u>Timeframe for implementation</u><br/>Immediate</p> <p><u>Emergency action</u><br/>Check actions taken to minimise dust/odour and odour risks are being adhered to. Move on to clearing litter from any other empty houses until wind speed drops. Litter and dust might be dampened ahead of being tipped into the trailer or in the trailer itself.</p> <p><u>Duration of action</u><br/>Removal of litter.</p> <p><u>Cessation of action</u><br/>Finished removing litter/ reduced wind speed.</p> <p>Sometimes opportunities to delay removing litter/washing out houses to avoid causing annoyance to sensitive receptors. However, cleaning/disinfection/drying and setting-up must be completed in readiness for the chicks being hatched for each house. Setting/incubation/hatching is scheduled weeks in advance and generally chicks can't be delivered anywhere else.</p> |          |
| Cleaning | <ul style="list-style-type: none"> <li>• Use of odorous products to clean houses.</li> </ul> | <p>Measures are described in and EPA 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Destocking and cleaning poultry houses end of every growing cycle. Occurs only 6 or 7 times each year and takes only a few days.</li> <li>• Professional contractors washing out the houses as soon as possible, normally within one day of destocking, and not normally more than 3 days (e.g. destocking on a Friday and cleaning out on a Monday). Cleaning out all the houses in as short a time as possible.</li> <li>• Cleaning on normal weekdays avoids causing annoyance at any sensitive receptors especially at weekends.</li> </ul>  | In place |

## Fennings Poultry Unit Odour Management Plan

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|                      |   | <ul style="list-style-type: none"> <li>• Only use suitable cleaning products and DEFRA approved disinfectants.</li> <li>• Keeping the houses closed and locked after cleaning and drying to contain the less offensive odour.</li> </ul>   |          |
| Managing dirty water | <ul style="list-style-type: none"> <li>• Preventing stagnation</li> <li>• Offensive odour from tankers emptying dirty water tanks.</li> </ul> | <p>Measures are described in and EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Installed kerbs to concrete aprons in front of the houses to direct dirty water into tanks.</li> <li>• Stockman and cleaning contractors keeping roadways, areas around buildings, dirty water grates and drains clear of litter, etc to avoid backing-up, pooling, or over spilling into surface water drains or on any unmade areas. Dirty water drains are flushed though after cleaning out the houses to prevent stagnation.</li> <li>• Installed package underground tanks with sufficient capacity for storing all the dirty water and access manholes are kept covered.</li> <li>• Professional contractors empty the tanks after cleaning is finished in readiness for the next, which avoids anaerobic conditions developing in the settled sludge.</li> <li>• Odour will be exhausted from the vacuum tanker during the emptying but takes less than an hour and only occurs 6 or 7 times every year and on normal weekdays.</li> <li>• Dirty water spread on land under the control of a separate farming business and a written agreement is in place.</li> <li>• Maintaining a preventive maintenance programme &amp; record keeping for buildings and equipment with stockman and professional contractors.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u><br/>One or more dirty water storage tanks not been emptied/ dirty water backing up drains/overflowing on to unmade ground/moderately or offensive odour/flyies.</p> <p><u>Timeframe for implementation</u><br/>Immediate</p> | In place |

## Fennings Poultry Unit Odour Management Plan

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|                  |                    | <p><u>Emergency action</u><br/>Stop washing affected poultry houses.<br/>Contact contractor to arrange emptying of storage tanks same day/next day.</p> <p><u>Duration of action</u><br/>Washing can't be resumed until the storage tanks have been emptied.</p> <p><u>Cessation of action</u><br/>Clean up any overflow outside/resume washing out poultry houses.</p>   |  |
| Carcass disposal | Inadequate storage | <p>Measures are described in and EPA 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and in the Poultry Industry Good Practice Checklist v2; 2013:-</p> <ul style="list-style-type: none"> <li>• Dead chickens, dead in shell embryos and egg shells will be removed the houses daily.</li> <li>• Storing carcasses, macerated dead-in-shell embryos and egg shells in bespoke, secure, non-leaking, wheelie bins with lids and kept locked.</li> <li>• Wheelie bins located farthest away from sensitive receptors on the central concrete hardstanding in between the new and older houses, but not provided much shade by surrounding buildings.</li> </ul> <div style="display: flex; justify-content: space-around; align-items: center;">   </div> |  |

## Fennings Poultry Unit Odour Management Plan

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|              |  | <ul style="list-style-type: none"> <li>• Wheelie bins removed weekly by an approved transporter under the National Fallen Stock scheme. Weekly collections considered normally adequate to prevent odour emissions from the site. Relatively few bins filled/collected with dead chicks/smallest birds for first few weeks of production cycle and increasingly more bins in latter weeks as chickens get bigger and increasing odour hazard.</li> <li>• Collecting/exchanging clean and disinfected wheelie bins for the filled ones.</li> <li>• No cleaning of wheelie bins on site.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u><br/>Most offensive odour/attracting flies/shortage of wheelie bins/prolonged hot weather (e.g. a heat wave). Met Office definition for a UK heat wave is an extended period of hot weather for 3 consecutive days with daily maximum temperatures meeting or exceeding the heat wave temperature threshold of 27°C for Suffolk.</p> <p><u>Emergency action</u><br/>Contact fallen stock collector immediately for more frequent collections (e.g. daily) starting same day or next day/ provision of more storage containers/sealing the lids with plastic bags/tape/stretch-wrap.</p> <p><u>Duration of action</u><br/>Continue with the frequent collections during hot weather.</p> <p><u>Cessation of action</u><br/>Change in the weather/cooler outside temperature.</p> |          |
| Bio-security | <ul style="list-style-type: none"> <li>• Disease and increased mortality, although significant disease outbreaks in commercial poultry flocks are rare.</li> <li>• Wet litter and increased odour via ventilation fans.</li> </ul> | <p>Measures are described in EPR 6.09 Sector Guidance Note; How to comply – Intensive Farming v2; 2010 and DEFRA; 2018 Code of practice for the welfare of meat chickens and meat breeding chickens:-</p> <ul style="list-style-type: none"> <li>• Site will be managed so that all the houses are empty at the same time to facilitate effective cleaning, disinfection, and disinfestations and drying. This all-in-all-out approach also acts as a disease break but also means the concentration of odour peaks from all the houses at the same time.</li> <li>• Professional veterinary input is available at all times.</li> </ul>  | In place |

## Fennings Poultry Unit Odour Management Plan

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|            |                    | <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u><br/>Moderately offensive odour/wet litter/higher mortality/sickness.</p> <p><u>Emergency action</u></p> <ul style="list-style-type: none"> <li>• Investigating mortality and medication and professional veterinary input maybe required.</li> <li>• Contact fallen stock collector immediately for more frequent collections (e.g. daily) starting same day or next day/ provision of more wheelie bins /sealing the lids with plastic bags/tape/stretch-wrap to minimise risk of transmission, and flies and odour.</li> <li>• Temporary carcase storage in empty houses/outside on concrete hard-standing as far away as possible from poultry houses and sensitive receptors and where they will not cause pollution via surface water drains and keep covered.</li> </ul> <p><u>Duration of action</u><br/>Continue treatment/medication and frequent collections while mortality is high.</p> <p><u>Cessation of action</u><br/>Optimum environmental conditions are restored/mortality reduced to normal levels.</p> |          |
| Waste skip | Inadequate storage | <ul style="list-style-type: none"> <li>• Secure, non-leaking, open top skips for storing waste, mostly plastic and paper packaging, metals and wood from maintenance activities, disposable clothing, waste similar to municipal waste from office, etc.</li> <li>• Located farthest away from sensitive receptors and poultry houses.</li> <li>• Skip collected/exchanged normally by a registered carrier at scheduled intervals, but the frequency of collections can be increased anytime.</li> </ul> <p><b><u>Emergency actions</u></b></p> <p><u>Trigger</u><br/>Most offensive odour/hot weather/attracting flies.</p> <p><u>Emergency action</u><br/>Contact waste contractor for exchange/collection same day or next day/keep covered.</p>   | In place |

**Fennings Poultry Unit Odour Management Plan**

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|--|--|--|--|
|  |  | <u>Duration of action</u><br>Keep covered until exchanged/collected. |  |
|  |  | <u>Cessation of action</u><br>Until skip is exchanged/collected.     |  |



**Fennings Poultry Unit Odour Management Plan**

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## **Fennings Poultry Unit Odour Management Plan**

### **1. Responsibility**

The Agricultural Director of Crown Chicken Ltd undertakes to adhere to the agreed plan at all times. The Environment Agency shall be notified without delay of any incident or accident, which is causing or may cause significant pollution as result of odour causing annoyance.

The Farm Manager/Assistant Manager/Stockmen are responsible for monitoring odour releases and emissions, ensuring the actions and emergency actions to minimise odour and odour risks are being adhered to and managing any complaints.

### **2. Contingency control measures including monitoring and complaints**

Measures for monitoring and managing complaints are described in Environment Agency (2011); Additional guidance for H4 Odour Management: How to comply with your environmental permit and BAT 26 in the BAT Conclusions Document (2017).

#### **(a) Monitoring**

- i. Daily checking the actions to minimise odour and risks from odour-related issues are being adhered to and sniff testing.
- ii. Sniff testing behind poultry houses N° 1 and 10 or 15 when the wind is blowing from the north-west, north, or north-east when odour might be expected to cause annoyance at some sensitive receptors in Stradbroke Road.

When northerly winds are blowing towards the sensitive receptors previously less offensive or moderately offensive odour might cause annoyance. In fine weather sensitivity is likely to be increased when people are more likely to have windows open and to be outside.

- iii. Stockman maybe accustomed to the odour through exposure and may not be able to detect or reasonably judge the intensity of odours off-site. People who have not recently been working on the farm might be more helpful. Anyone who has a cold, sinusitis or a sore throat is likely to underestimate the odour. Strong food or drinks, including coffee, should be avoid for at least half an hour before sniff testing and avoid strongly scented toiletries and deodorisers in vehicles.
- i. Sniff testing along the access roadway off Stradbroke Road maybe warranted to substantiate results of on-site testing. Check the actions and the emergency actions in the OMP are being implemented and adhered to.
- ii. It might be prudent to inform residents (neighbours) at sensitive receptors to make them aware an odour nuisance might be expected, has been substantiated and actions are being taken to minimise an odour.

## **Fennings Poultry Unit Odour Management Plan**

- iii. Record in the farm diary an odour nuisance at sensitive receptors which was expected or substantiated, and actions or emergency actions taken to minimise odour as quickly as possible.

### **(b) Complaints**

- i. Complaints must be recorded and investigated immediately including checking the actions and emergency actions to minimise odour and risks are being adhered to. If the odour is no longer apparent the investigation must still be completed and recorded on the same day.
- ii. Tell the complainant and anyone else likely to have been affected what you have done.
- iii. Details of the complaint and the actions taken must be recorded on the Odour Complaint Report form (below) and kept in the site office. A copy must be sent to the Agricultural Director immediately.

### **3. Review**

Review the effectiveness of the OMP including the odour related issues and actions to minimise odour and odour risks at least once a year. Maybe sooner if there have been complaints or relevant changes to any operations or infrastructure.

## Fennings Poultry Unit Odour Management Plan

### History of changes

| Version | Review Date    | Reviewed by   |
|---------|----------------|---|
| 1       | October 2007   | Created for installation permit application   |
| 1       | November 2007  | D Bush with no changes made   |
| 1       | July 2011      | D Bush with no changes made   |
| 1       | July 2012      | D Bush with no changes made   |
| 1       | September 2015 | D Bush with no changes made   |
| 1       | August 2018    | D Bush with no changes made   |
| 2       | June 2020      | Generally revised by Green Inc Solutions Ltd to accompany the application for variation to increase the number of places for broiler chickens and increase the installation boundary for development with 6No. poultry houses and equipment to provide the additional places. Identified the sensitive receptors, added further actions to minimise odour and odour risks and contingency controls including monitoring and complaints. The OMP will be approved by the Environment Agency with the new permit variation. |
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## Fennings Poultry Unit Odour Management Plan

### Odour Complaint Report

|                                  |  |
|----------------------------------|--|
| Time and date of complaint       |  |
| Name and address of complainant  |  |
| Telephone number of complainants |  |

|   |  |
|---|--|
| Date of odour   |  |
| Time of odour   |  |
| Location of odour, if not at above address  |  |
| Weather conditions<br>( <i>dry, rain, fog, snow</i> )   |  |
| Temperature<br>( <i>very warm, warm, mild, cold</i><br><i>or degrees if known</i> )   |  |
| Wind strength<br>( <i>none, light, steady, strong, gusting</i> )  |  |
| Wind direction<br>( <i>e.g. from SW</i> )   |  |
| Complainant's description of odour<br>What does it smell like?<br><br>Odour intensity<br>0 No odour<br>1 Very faint odour<br>2 Faint odour<br>3 Distinct odour<br>4 Strong odour<br>5 Very strong odour<br>6 Extremely strong odour |  |
| <input type="checkbox"/> Duration (time)  |  |
| <input type="checkbox"/> Constant or intermittent in this period  |  |
| <input type="checkbox"/> Does the complainant have any other comments about the odour?  |  |
| Are there any other complaints relating to the installation, or to that location (either previously or relating to the same exposure):  |  |
| Any other relevant information:   |  |
| Do you accept that odour likely to be from your activities?   |  |
| What was happening on site at the time the odour occurred?  |  |
| Actions taken   |  |

## Fennings Poultry Unit Odour Management Plan

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| Complainant visited   |       |         |
| Complainant contacted with explanation<br>Yes/No<br>Date<br>By whom |       |         |
| Form completed by   | Date: | Signed: |

Environment Agency (2011); Additional guidance for H4 Odour Management: How to comply with your environmental permit.

Complaints and the results of the investigation must be recorded on the Odour Complaint Report form and kept in the Complaints Log in the site office. A copy must be sent to the Agricultural Director immediately.

**From:** Hobbs, Kirsty <[kirsty.hobbs@environment-agency.gov.uk](mailto:kirsty.hobbs@environment-agency.gov.uk)>

**Sent:** 30 October 2020 16:38

**To:** [k.collett420@btinternet.com](mailto:k.collett420@btinternet.com)

**Subject:** Application EPR/BP3633UQ/V006 - Fennings Poultry Unit - Request for information

Dear Karl,

**Application Reference: EPR/BP3633UQ/V006**

**Operator: Crown Chicken Limited**

**Facility: Fennings Poultry Unit**

Further to my last email, I have now reviewed the application contents and received initial internal comments. I need to ask you for some more information before I can do any more work on it. Please provide the following:

1. Site boundary

Please check and confirm the correct site boundary and amend any documents, as necessary. The site boundary appears to be slightly different on the following plans: the plan provided for the pre-app request, the site layout/drainage plan provided for this variation and on the site plan for variation V003 (the right edge and the section encompassing the generator and fuel storage). I've attached a copy of the site plan from variation V003 for reference.

Submitted amended drawings:

[Drainage Plan Fennings Farm, Pixey Green, Stradbroke.pdf](#)

[Site Layout Plan Groundsure Land Adjacent to Fennings Farm, Pixey Green, Stradbroke.pdf](#)

Specifically, matched to the existing boundary on eastern side and around the generator and fuel store, so no ground is being excluded or added this side. The boundary on the western side has been extended over more ground to accommodate proposed poultry houses. All the extra ground is covered in the Site Condition Report submitted with the application.

Submitted second Pre-application Request for ammonia screening with the amended Site Layout Plan, owing to operators wanting to increase the number of places they are seeking in a variation up from 560,500 to 570,000. Also submitted amended Part C3.5 in section 8.8d Number of animal places.

2. Site Location Plan

Following on from question 1, please provide a site location plan for the variation. We require a site location plan to be better able to place the installation location in relation to features such as houses, roads, ponds, woods etc.

Submitted OS Location Plan for Fennings Poultry Unit, Pixey Green. Covers approx. six square kilometres with the proposed boundary of Fennings Poultry Unit marked in green in the centre, the B1118 is visible in the south-west corner.

3. National Grid Reference (NGR)

The NGR for the centre of the site provided in the pre-app request form is different to the NGR provided in the Site Condition Report (SCR). Please check the NGR provided and amend the SCR if required.

Submitted SCR with amended NGR on page 1 and deleted reference on page 2, otherwise without any other changes. Site will be centred on NGR TM 24695 75854 including the proposed development with 6No. poultry houses. Established with confidence using OS online standard maps with a better zoom and grid reference finder.

4. Non-technical summary

The response to question 2b is listed as the non-technical summary. Please revise to include a summary of the activities currently at the farm. This will need to include as a minimum, details of the broiler cycle e.g. cycle length, number of cycles.

B2.2b About your proposal – Non-technical summary

The Operator details will be unchanged.

Green Inc Solutions Ltd has been instructed by Mr Peter Davidson of C. E. Davidson Ltd to prepare an application for a variation of the permit head of making a planning application for Crown Chicken Ltd.

Proposing to increase the permitted boundary over adjacent greenfield to the west side of the farm to construct 6No new poultry houses (total 15No poultry houses) with point source emissions to air, water and land, and increase number of places for rearing broiler chickens intensively from 280,000 to 570,000. Also proposing provision for using new technology for hatching eggs inside the existing and proposed poultry houses where the chickens will be reared. A new building is also proposed for an office, mess room and welfare facilities.

Proposed houses will be designed, equipped, and operated in accordance with How to comply EPR6.09 and Best Available Techniques (BAT) conclusions document.

Proposed houses will be designed and constructed to modern specifications – wide span steel portal frames, concrete panel walls and concrete floors poured over a continuous damp proof membrane, insulated walls and low-pitched roofs covered in plastic coated steel cladding. Houses will be ventilated via side inlets on both



sides and the air taken out by high velocity extraction fans on the roofs (vents greater than 5.5m high and efflux velocity greater than 7m/s) with outlet cones, and gable end fans for additional ventilation in warmer weather. Package nipple drinking systems with cups will be installed to avoid spillages and keep litter dry, and water consumption will be monitored daily. Ventilation will be computer controlled to remove moisture under all weather and seasonal conditions while meeting the physiological needs of the chickens. Regularly adjusting ventilation to match age, and weight and health requirements of the chickens, and to help keep droppings and litter dry and friable to reduce ammonia and odour.

Proposed houses will be installed with new package feed silos and feed delivery equipment, new tanks for storing liquid petroleum gas (LPG) for heating and new package underground tanks for storing dirty water similar to existing houses. Otherwise will continue storing mains water and diesel in the existing tanks and in a package back-up generator.

Uncontaminated roof water will be conveyed via stone filled French drains with perforated pipes under the eaves of the 6No. proposed houses acting as soakaways to infiltrate into the ground, then solid underground pipes into an off-site ditch adjacent the northern boundary, next into a watercourse identified as a tributary of the River Waveney. Uncontaminated surface water run-off the open concrete apron (excluding during periods of litter removal and washout) will be conveyed via solid underground pipes also into the off-site ditch. Dirty water from litter removal and washout will be channelled via a diverter into package underground concrete encased dirty water tanks and transferred off-site.

Prior to chickens arriving new bedding material will be spread in a uniform layer over the entire floor area using a proprietary blend of dust extracted chopped straw and wood shavings or dust extracted straw. The poultry houses will be heated using LPG-fired space heaters and temperature and humidity will be controlled. As the chickens grow the temperature will be reduced by using the heaters less and increasing ventilation. Day old chicks will be brought into the houses or incubated eggs for hatching in the houses where the chickens will be reared using latest technology in both the existing and proposed houses. The total number of chickens including any combination of day-old chicks and eggs for hatching on-site will never exceed the number of production places. About a quarter of the chickens will be removed for slaughter around 31 days of age to provide smaller birds for sale and allow the remainder to be reared for longer and will be removed and slaughtered at around 38 days of age. There will be around 10 days empty after destocking for cleaning and disinfection allowing for 7.6 production cycles per annum.

Feed pellets (crumbled first 2 weeks) will be supplied from a local mill in an assurance scheme to provide chickens with balanced diets and with decreasing crude protein and phosphorous, meeting their physiological needs at each stage

of rearing without excess nitrogen and phosphorous being wastefully excreted. Feed will be provided to chickens with pan feeders to reduce wastage and minimise dust.

Unhatched eggs, empty shells and mortalities will be removed daily and recorded. Stored in secure containers to minimise odour and flies, for off-site removal under the Fallen Stock Scheme.

At the end of the rearing periods after chickens have been removed, the litter will be removed and exported off-site in covered trailers for spreading on land owned by a third party to confer agricultural benefit or supplied to a local power station as fuel. All the houses and equipment will be pressure washed, disinfected, and dried, before restocking. Dirty water from washing will be conveyed to underground storage tanks and exported off-site. Waste packaging, etc will be removed by a registered waste carrier.

There are no Sites of Special Scientific Interest, ancient woodlands, local wildlife sites, national or local nature reserves within 2km. No internationally designated Ramsar, special areas of conservation or special protection areas within 5km. There are sensitive receptors within 400m, including dwellings and commercial premises and the operator will be complying with the approved odour, noise and dust and bio-aerosol management plans to prevent or minimise annoyance.

5. Raw Materials Inventory

The Raw Materials Inventory included within the Supporting Information document is dated April 2019. Please confirm that this has been reviewed for the proposed changes and provide an updated copy, as necessary.

Submitted C3.8c Raw Materials Inventory for Fennings Poultry Unit including higher stock holding and usage including for the 6No. proposed houses.

6. Site drainage plan

The drainage plan for the new poultry houses, document ref CED-114 and dated 24/07/18, includes a key for dirty water and storm water. Please clarify what is meant by storm water.

Developers reference to mix of uncontaminated roof water from the 6No. proposed poultry houses (10-15) and surface water run-off the concrete apron (excluding all times yards are contaminated e.g. catching, removing litter, and washing).

Application forms Part A and F1 have been submitted with the application, please note that these aren't normally required for Intensive Farming variations where only application form Part C3.5 is required.

Please provide the information requested by 13/11/20. If we don't hear from you, we must return your application.

When we receive the requested information, we'll continue to check your application. We'll check to see if there's enough information for the application to be 'duly made'. Duly made means that we have all the information we need to begin determination. Determination is where we assess your application and decide if we can allow what you've asked for.

We'll let you know whether your application can be duly made. If it can't be duly made, we'll return your application to you.

If we do have to return your application, we'll send you a partial refund of your application payment. We'll retain 20% of the application charge to cover our costs in reviewing your application and requesting information. This maximum amount we'll retain is capped at £1,500. Further information on charging can be found at: <https://www.gov.uk/government/publications/environmental-permitting-ep-charges-scheme>

Please contact me if you have any queries.

Kind regards,  
Kirsty

**Kirsty Hobbs**

Senior Permitting Officer, National Permitting Service  
Part of Operations – Regulation, Monitoring and Customer

**Environment Agency**

[kirsty.hobbs@environment-agency.gov.uk](mailto:kirsty.hobbs@environment-agency.gov.uk)

External: 02030 252772 | Internal: 32772

Working Days: Monday to Friday

**DC/21/06824 | Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development) | Land At Fennings Farm Pixey Green Stradbroke Suffolk**

**Horham & Athelington Parish Council Comments**

Horham & Athelington Parish Council have not, formally, been consulted on the planning application DC/21/06824 (above) but wish to make comments on the proposal, in view of the fact that it is likely to have a direct and detrimental impact upon the amenity of the residents of Horham and those of surrounding villages.

**1) HGV Movements and Cumulative Impact**

**Current Situation**

HGVs associated with the Cranswick (Crown) poultry feed mill, which is situated in Denham, currently route through Horham travelling east to Stradbroke and beyond and south to Worlingworth and beyond, transporting poultry feed to Cranswick's large network of intensive poultry units in the region; the HGVs return via the same routes.

Horham residents have noticed a significant increase in the number of HGVs travelling through the village within the last two years, since Crown Milling began operating from the site in Denham and it must be pointed out that the poultry feed lorries have been witnessed travelling in **both** directions through the village, not, as claimed in the applicant's Environment Statement (S5.43) that: "... *Denham Mill operates a one-way system with traffic routing in via Hoxne and leaving toward Horham via Fennings Farm.*"

The B1117 runs through Horham and is not a designated HGV route on the SCC Lorry Route Network. In fact, HGVs travelling between Horham and Stradbroke have to negotiate a tight double bend just outside the Horham village 30mph sign which necessitates HGVs crossing the central white line on the bends. In addition, increased HGV movements on the route between Horham and Stradbroke have been a major contributing factor to the collapse of the high roadside bank near the bridge over Chickering Beck in 2020, where the road width is narrower. Temporary traffic lights had to be installed by SCC Highways, as only a narrow section of the carriageway was passable and remained in place for over a year (between late 2020 and 2021) until finally being removed in December 2021. However, this stretch of road is on an incline and frequently experiences water run-off from adjoining fields during periods of heavy rain, which in turn causes road surface water to rapidly course downhill towards the Beck. This, in addition to increasing HGV movements will lead to further erosion of the roadside bank and will become an ongoing problem and potential road safety hazard.

**Proposed HGV Movements**

With regard to planning application DC/21/06824, the Parish Council notes that S5.41 of the Environment Statement states: "*The following elements and their location are offered as informative and based on existing contracts (they are of course subject to the market and contracts in the event of planning permission): Feed – Denham Mill (30%) and Kenninghall Mill (70%)*". Given the applicant's caveat in brackets and the fact that Denham Mill is situated closest to the application site, it is safe to assume that 30% of the additional 674 HGV movements of feed per year will represent the **minimum increase** in HGV traffic through Horham and surrounding villages.

Denham Mill (Crown Milling) acquired an Environmental Permit in 2021 to increase the production of poultry feed, resulting in nearly 20,000 HGV movements a year. The growing number of HGVs associated with this business, travelling through Horham, has had a detrimental impact on the living conditions of local residents on The Street, especially with regard to the enjoyment of gardens and outdoor space, where conversations are curtailed when two or three lorries pass in quick succession. An increase in HGV traffic associated with this planning application will have a further detrimental impact on the amenity of residents of Horham.

The Environmental Statement S2.8 **Table 2** includes the following SCC Highways (31.3.21) recommendation in the Scoping Report: "*The application should consider any impacts the additional traffic generated by the development will have on the highway network when the facility is in production...*" "*A Transport Management Plan will also be required. Once the details are supplied, **mitigation may be required on the existing highway within surrounding villages; including Eye Town centre.***"

The Parish Council is of the view that the applicant's Transport Assessment does not provide adequate analysis of the cumulative impact of HGV movements on routes between surrounding villages, specifically Horham and including Denham, Stradbroke and Hoxne.

The Transport Assessment does not address how highway safety issues highlighted by Denham Parish Council (concerning the significant increase in the volume of HGVs accessing and leaving the poultry feed mill in Denham and the resulting detrimental impact on the amenity of residents and rising highway safety concerns), Stradbroke Parish Council (concerning restricted two-way HGV movements and the impact on highway safety on Queen Street) and Hoxne Parish Council (concerning the number of vehicle collisions along Chickering Road (B1118) Hoxne, near the entrance to the Depperhaugh Care Home – see SCC Highways Report, November 2019) can be mitigated.

With regard to the SCC Highways Report on Chickering Road (B1118), it should be noted that HGVs transporting poultry feed to and from the mill in Denham, access and exit the B1118 via a junction near the Depperhaugh Care Home, by way of a single carriageway, narrow lane, classified 'C' road, also known as Chickering Road. According to the SCC Highways report there were seven collisions in the 5 year period to 2019, two classified as 'serious' near the entrance to the Depperhaugh Care Home.

The applicant's Environment Statement (S5.25) states that "*Links or junctions that exhibit 1 accident per annum are considered to be significant*" and continues "*Taking this into consideration, it is therefore considered that there are no existing highway safety issues on the local highway network*". S5.26 "*.... there are no highway safety issues that the development is expected to exacerbate.*"

The Parish Council is of the opinion that the proposed development **will** exacerbate the highway safety issues already identified by Denham, Hoxne and Stradbroke and **will** exacerbate the problem of roadside erosion on the stretch of the B1117 between Horham and Stradbroke. The planning application does not identify how the proposed development will meet the requirement of NPPF para.110(d) and is contrary to Policies CL15 and CL17 of the Local Plan.

## **2) Waste**

The Parish Council wishes to bring attention to the fact that there is a lack of information concerning the destination of waste from the application site. The Variation to the Environmental Permit for the facility states: "*Litter will be exported from the installation. Records will be kept of the quantities and the date of transfer, for example to a power station for recovery or third party for spreading on land and the names and addresses of the receiving farms.*"

The removal of waste litter from the application site will generate significant numbers of HGV movements and if not destined for power stations, will be spread on land (unspecified in the supporting documentation for the planning application) which does not belong to the applicant. Legal judgement in the cases of Squire v Shropshire Council and Keating v East Suffolk Council requires that the land destined for the spreading of poultry waste must be identified, for direct and indirect environmental effects to be properly assessed.

This lack of information concerning the removal of waste (both poultry litter and waste water) reinforces the Parish Council's view that the applicant's Transport Assessment does not provide adequate analysis of the cumulative impact of HGV movements on routes between surrounding villages, specifically Horham and including Denham, Stradbroke and Hoxne.

## **3) Water usage**

This planning application will have a very high demand for water. Whilst high water consumption by the poultry meat processing factory on Eye Airfield has been accounted for in the Water Cycle Study (2020), the high demand for water by an increasing number of intensive poultry units supplying the meat factory have not.

Moreover, the Statement of Common Ground between BMSDC and Essex & Suffolk Water (2020) makes clear that that Essex & Suffolk Water "is unable to provide water in the current ...plan period for new non-domestic processing activities" and that to be able to support such 'non domestic' water consumption would "require investment in infrastructure or water transfer, which would unlikely be operational until 2027".

This planning application may put residential development plans at risk but the issue has not been addressed in any of the supporting documentation for the planning application.

## **4) Summary**

Whilst not a formal consultee, Horham & Athelington Parish Council wish to object to planning application DC/21/06824, on the basis of concerns relating to planning matters outlined above.

# **Consultee Comments for Planning Application DC/21/06824**

## **Application Summary**

Application Number: DC/21/06824

Address: Land At Fennings Farm Pixey Green Stradbroke Suffolk

Proposal: Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

Case Officer: Mahsa Kavyani

## **Consultee Details**

Name: Mr Andy Parris

Address: The Stooks, New Street, Fressingfield Eye, Suffolk IP21 5PG

Email: Not Available

On Behalf Of: Fressingfield Parish Clerk

## **Comments**

The council noted the fact that HGV traffic would not flow through Fressingfield and recognises the positive effect on the local economy due to the growth in the chicken-economy.

The council recommends approval of this application.



Historic England

Ms Mahsa Kavyani  
Babergh and Mid Suffolk District Councils  
Endeavor House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

Direct Dial: 01223 582740

Our ref: **W:** P01450734

10 January 2022

Dear Ms Kavyani

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND AT FENNINGS FARM, PIXEY GREEN, STRADBROKE, MID SUFFOLK,  
SUFFOLK, IP21 5NH  
Application No. DC/21/06824**

Thank you for your letter of 21 December 2021 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

**Sophie Cattier**

Assistant Inspector of Historic Buildings and Areas  
E-mail: [sophie.cattier@HistoricEngland.org.uk](mailto:sophie.cattier@HistoricEngland.org.uk)



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

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Date: 23 September 2022  
Our ref: 406326  
Your ref: DC/21/06824



planningyellow@babberghmidsuffolk.gov.uk

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Ms Kavyani

**Planning consultation:** Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

**Location:** Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk

Since our last response, the applicant has provided additional information (email dated 2 September) and, as such, Natural England offers the following updated advice.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

**SUMMARY OF NATURAL ENGLAND'S ADVICE  
NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

**Chippenhall Green Site of Special Scientific Interest**

Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

This advice is based on the information provided by the applicant that the maximum capacity of chickens per shed is 48,913, as per industry stocking standards and legal requirements. Your authority may wish to consider whether this should be subject to a planning condition.

**Other advice**

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Should the proposal change, please consult us again. If you have any queries relating to the advice in this letter please contact me on 07471 515535.

Yours faithfully  
Joanna Parfitt  
Norfolk and Suffolk Team



Babergh District Council  
Development Control  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2022/127200/02-L01  
**Your ref:** DC/21/06824  
**Date:** 11 August 2022

Dear Sir/Madam

**6NO. POULTRY HOUSES WITH ASSOCIATED ADMIN BLOCKS, FEED BINS  
AND ANCILLARY DEVELOPMENT FENNINGS FARM (ORCHARD HOUSE)  
PIXEY GREEN, STRADBROKE, EYE, IP21 5NH.**

Thank you for re-consulting us on the above application. We have submitted the newly submitted documents and can confirm that we have assessed the updated information relating to the odour model and have provided you further information below.

**Odour**

We have noted the clarification provided by the applicant on the number of broilers that the farm will house - being 530,000 operationally (rather than 570,000 as in the Environmental Permit). Therefore, we now consider this aspect of the odour modelling to be appropriate. Although the odour emissions from the gable end fans are not included in the Odour Modelling and Assessment, we would suggest that you consider this in your assessment of this application, that they are used during hot weather (depending on the age of the broilers) and that these are the days when residents tend to either be outside in their gardens or have house windows open.

We trust the above is useful.

Yours faithfully

**Miss Natalie Kermath**  
**Planning Advisor**  
Direct e-mail [planning.ipswich@environment-agency.gov.uk](mailto:planning.ipswich@environment-agency.gov.uk)

Babergh District Council  
Development Control  
Endeavour House Russell Road  
Ipswich  
Suffolk  
IP1 2BX

**Our ref:** AE/2022/127200/01-L01  
**Your ref:** DC/21/06824  
**Date:** 28 June 2022

Dear Sir/Madam

**6NO. POULTRY HOUSES WITH ASSOCIATED ADMIN BLOCKS, FEED BINS  
AND ANCILLARY DEVELOPMENT FENNINGS FARM (ORCHARD HOUSE)  
PIXEY GREEN, STRADBROKE, EYE, IP21 5NH.**

Thank you for consulting us on the above application. We have reviewed the documents as submitted and can confirm that we have no objection to the proposed development. We have however provided further information below in relation to Odour. Odour falls under an amenity issue and therefore is not within our remit to object upon. You should review the information below in order to make an informed decision on the application.

**Odour**

The Odour Modelling and Assessment that has been provided in this planning application is not accurate enough to provide a view on whether the proposal will be acceptable.

The modelling uses 538,000 broilers as its input figure. But the Environmental Permit for the farm has a capacity of 570,000 broilers. Also the modelling does not assess the odour that might be emitted when the Gable End Fans are in use. The report states that the Gable End Fans are only in use when the outside temperature is greater than 28 degrees C and so is not considered normal operation. However, through experience of inspecting similar broiler units we know that gable end fans are often in use when the temperature might be considered hot but is less than 28 degrees C (it will depend on the age/size of the broilers). These are the days that residents are wanting to use their gardens/outdoor spaces and will tend to have their windows open. So on these days they are more aware of any odours that might affect their enjoyment of the weather. These are often the type of days when we receive reports of odours from broiler units. Gable end fans emit odour and dust at a lower level than the roof vents that are currently included in the model and so may not disperse as efficiently.

Therefore you may consider it appropriate to ask that the effects of the gable end fans be included in the odour modelling/assessment.

The Environmental Permit for the farm requires that the farm "minimise emissions" through the use of Best Available Techniques" (BAT), that are detailed in their Odour Management Plan for the farm. It does not require there to be no odour emissions outside the boundary. It is appropriate for the modelling and assessment provided as part of this planning application to assume that BAT will be used for the construction and operation of the farm.

We trust the above is useful.

Yours faithfully



**Miss Natalie Kermath**  
**Planning Advisor**

Direct e-mail [planning.ipswich@environment-agency.gov.uk](mailto:planning.ipswich@environment-agency.gov.uk)

Growth, Highways and Infrastructure  
Bury Resource Centre  
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Philip Isbell  
Corporate Manager - Development Manager  
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Babergh and Mid Suffolk District Councils  
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Email: [Matthew.Baker@suffolk.gov.uk](mailto:Matthew.Baker@suffolk.gov.uk)  
Web: <http://www.suffolk.gov.uk>

Our Ref: CSF 45147  
Date: 10<sup>th</sup> January 2022

For the Attention of Mahsa Kavyani

Dear Mr Isbell

**Planning Application DC/21/06824/FUL – Land At Fennings Farm, Pixey Green, Stradbroke: Archaeology**

This site lies in an area of archaeological potential recorded on the County Historic Environment Record (HER), in close proximity to a medieval green visible on the Hodskinson's 1783 map of Suffolk (HER ref no. SBK 064) and a medieval artefact scatter (SBK 046). Archaeological investigations undertaken in 1993, during the instillation of a water pipeline, close to the site have identified medieval artefact scatters (WGD 017 & WGD 018) and two scatters of burnt flint (SBK 019 & SBK 020). As a result, there is high potential for the discovery of below-ground heritage assets of archaeological importance within this area, and groundworks associated with the development have the potential to damage or destroy any archaeological remains which exist.

There are no grounds to consider refusal of permission in order to achieve preservation *in situ* of any important heritage assets. However, in accordance with the *National Planning Policy Framework* (Paragraph 205), any permission granted should be the subject of a planning condition to record and advance understanding of the significance of any heritage asset before it is damaged or destroyed.

In this case the following two conditions would be appropriate:

1. No development shall take place within the area indicated [the whole site] until the implementation of a programme of archaeological work has been secured, in accordance with a Written Scheme of Investigation which has been submitted to and approved in writing by the Local Planning Authority.

The scheme of investigation shall include an assessment of significance and research questions; and:

- a. The programme and methodology of site investigation and recording
- b. The programme for post investigation assessment
- c. Provision to be made for analysis of the site investigation and recording
- d. Provision to be made for publication and dissemination of the analysis and records of the site investigation
- e. Provision to be made for archive deposition of the analysis and records of the site investigation
- f. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.
- g. The site investigation shall be completed prior to development, or in such other phased arrangement, as agreed and approved in writing by the Local Planning Authority.

2. No building shall be occupied until the site investigation and post investigation assessment has been completed, submitted to and approved in writing by the Local Planning Authority, in accordance with the programme set out in the Written Scheme of Investigation approved under part 1 and the provision made for analysis, publication and dissemination of results and archive deposition.

**REASON:**

*To safeguard archaeological assets within the approved development boundary from impacts relating to any groundworks associated with the development scheme and to ensure the proper and timely investigation, recording, reporting and presentation of archaeological assets affected by this development, in accordance with Core Strategy Objective SO 4 of Mid Suffolk District Council Core Strategy Development Plan Document (2008) and the National Planning Policy Framework (2021).*

**INFORMATIVE:**

*The submitted scheme of archaeological investigation shall be in accordance with a brief procured beforehand by the developer from Suffolk County Council Archaeological Service.*

I would be pleased to offer guidance on the archaeological work required and, in our role as advisor to Mid Suffolk District Council, the SCC Archaeological Service will, on request of the applicant, provide a specification for the archaeological work required at this site. In this case, an archaeological evaluation will be required, prior to the submission of the reserved matters application, to establish the potential of the site and decisions on the need for any further investigation (excavation before any groundworks commence and/or monitoring during groundworks) will be made on the basis of the results of the evaluation.

The evaluation should be undertaken once the building on site has been demolished to ground level, but with no grubbing out of foundation.

Further details on our advisory services and charges can be found on our website: <http://www.suffolk.gov.uk/archaeology/>

Please do get in touch if there is anything that you would like to discuss or you require any further information.

Yours sincerely,

Matthew Baker

Archaeological Officer  
Suffolk County Council Archaeological Service

Mid Suffolk District Council  
Planning Department  
Endeavour House  
Russell Road  
Ipswich  
IP1 2BX

Fire Business Support Team  
Floor 3, Block 2  
Endeavour House  
8 Russell Road  
Ipswich, Suffolk  
IP1 2BX

Your Ref:  
Our Ref: FS/F180965  
Enquiries to: Water Officer  
Direct Line: 01473 260588  
E-mail: Fire.BusinessSupport@suffolk.gov.uk  
Web Address: <http://www.suffolk.gov.uk>

Date: 22/12/2021

Dear Sir

**LAND AT FENNINGS FARM, PIXEY GREEN, STRADBROKE, IP21 5NH**  
**Planning Application No: DC/21/06824**

I refer to the above application.

The plans have been inspected by the Water Officer who has the following comments to make.

**Access and Fire Fighting Facilities**

Access to buildings for fire appliances and firefighters must meet with the requirements specified in Building Regulations Approved Document B, (Fire Safety), 2019 Edition, Volume 1 - Part B5, Section 11 dwelling houses, and, similarly, Volume 2, Part B5, Sections 16 and 17 in the case of buildings other than dwelling houses. These requirements may be satisfied with other equivalent standards relating to access for fire fighting, in which case those standards should be quoted in correspondence.

Suffolk Fire and Rescue Service also requires a minimum carrying capacity for hard standing for pumping/high reach appliances of 15/26 tonnes, not 12.5 tonnes as detailed in the Building Regulations 2000 Approved Document B, 2019 Edition.

**Water Supplies**

Suffolk Fire and Rescue Service records show that the nearest fire hydrant in this location is over 426M from the proposed build site and we therefore recommend that proper consideration be given to the potential life safety, economic, environmental and social benefits derived from the provision of an automatic fire sprinkler system. (Please see sprinkler information enclosed with this letter).

Consultation should be made with the Water Authorities to determine flow rates in all cases.

/continued

OFFICIAL

Should you need any further advice or information on access and fire fighting facilities, you are advised to contact your local Building Control or appoint Approved Inspector in the first instance. For further advice and information regarding water supplies, please contact the Water Officer at the above headquarters.

Yours faithfully

*Water Officer*

Suffolk Fire and Rescue Service

Copy: [jonny@parkerplanningservices.co.uk](mailto:jonny@parkerplanningservices.co.uk)

Enc: Sprinkler Information

OFFICIAL

**From:** GHI Floods Planning

**Sent:** 09 February 2022 09:46

**Subject:** 2022-02-09 JS Reply Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk Ref DC/21/06824

Dear Mahsa Kavyani,

Subject: Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk Ref DC/21/06824

Suffolk County Council, as Lead Local Flood Authority (LLFA), have reviewed application ref DC/21/06824.

The following submitted documents have been reviewed and we recommend **approval of this application subject to conditions:**

- Site Layout Ref CM-00967236
- Site Layout (Drainage) Ref CED-LAY2 Rev 4
- Drainage Layout Ref CED-114 Rev 2
- Flood Risk Assessment & Surface Water Drainage Strategy Ref 27344 Rev A

We propose the following condition in relation to surface water drainage for this application.

1. The strategy for the disposal of surface water and the Flood Risk Assessment (FRA) (dated January 2022, ref: 27344 Rev A) shall be implemented as approved in writing by the local planning authority (LPA). The strategy shall thereafter be managed and maintained in accordance with the approved strategy.

*Reason: To ensure that the principles of sustainable drainage are incorporated into this proposal, to ensure that the proposed development can be adequately drained*

Informatives

- Any works to a watercourse may require consent under section 23 of the Land Drainage Act 1991
- Any discharge to a watercourse or groundwater needs to comply with the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017
- Any discharge of surface water to a watercourse that drains into an Internal Drainage Board district catchment is subject to payment of a surface water developer contribution
- Any works to lay new surface water drainage pipes underneath the public highway will need a licence under section 50 of the New Roads and Street Works Act
- Any works to a main river may require an environmental permit

Kind Regards

Jason Skilton  
Flood & Water Engineer  
Suffolk County Council



Your Ref: DC/21/06824  
Our Ref: SCC/CON/5727/21  
Date: 7 September 2022  
Highways Enquiries to: Highways.DevelopmentControl@suffolk.gov.uk



**All planning enquiries should be sent to the Local Planning Authority.**

Email: [planning@babberghmidsuffolk.gov.uk](mailto:planning@babberghmidsuffolk.gov.uk)

The Planning Department  
Babergh MidSuffolk District Council  
Planning Section  
1st Floor, Endeavour House  
8 Russell Road  
Ipswich  
Suffolk  
IP1 2BX

For the attention of: Mahsa Kavyani

Dear Mahsa

**TOWN AND COUNTRY PLANNING ACT 1990 CONSULTATION RETURN: DC/21/06824**

**PROPOSAL:** Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

**LOCATION:** Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk

Notice is hereby given that the County Council as Highway Authority make the following comments:

Further to additional correspondence and information from the applicant's consultants, a further site visit and consideration of the proposal, we are no longer in a position to uphold an objection on this proposal. Whilst the proposal will generate a modest increase in HGV traffic, it is not at a level that we could maintain an objection upon as having a severe or unacceptable impact (NPPF 111). It should also be noted that significant parts of the identified routes form part of the Suffolk Lorry Route network.

**Recommended planning conditions:**

Condition: All HGV delivery traffic movements to and from the site once the development has been completed, shall be subject to a Deliveries Management Plan which shall be submitted and approval in writing to the Local Planning Authority for approval.

No HGV movements shall be permitted to and from the site other than in accordance with the routes defined in the Plan.

Reason: In the interests of highway safety, to ensure adequate servicing arrangements are provided for and to reduce or remove as far as is reasonably possible the effects of HGV traffic in sensitive areas.

Condition: Before the development is commenced details of the areas and infrastructure to be provided for the loading, unloading, manoeuvring and parking of vehicles including powered two-wheeled vehicles, cycles and electric vehicle charging points shall be submitted to and approved in writing by the Local Planning Authority. The approved scheme shall be carried out in its entirety before the development is brought into use and shall be retained thereafter and used for no other purpose.

Reason: To ensure the provision and long term maintenance of adequate on-site space for the parking and manoeuvring of vehicles in accordance with the current Suffolk Guidance for Parking where on-street parking and or loading, unloading and manoeuvring would be detrimental to highway safety.

Condition: Prior to first use visibility splays shall be provided as shown on Drawing No. 210486-01 with an X dimension of 2.4 metres and Y dimensions of 135 and 148 metres [tangential to the nearside edge of the carriageway] and thereafter retained in the specified form. Notwithstanding the provisions of Part 2 Class A of the Town & Country Planning (General Permitted Development) Order 2015 (or any Order revoking and re-enacting that Order with or without modification) no obstruction to visibility shall be erected, constructed, planted or permitted to grow over 0.6 metres high within the areas of the visibility splays.

Reason: To ensure drivers of vehicles entering the highway have sufficient visibility to manoeuvre safely including giving way to approaching users of the highway without them having to take avoiding action and to ensure drivers of vehicles on the public highway have sufficient warning of a vehicle emerging in order to take avoiding action, if necessary.

Condition: Before the development hereby permitted is commenced a Construction Management Plan shall have been submitted to and approved in writing by the Local Planning Authority. Construction of the development shall not be carried out other than in accordance with the approved plan.

The Construction Management Plan shall include the following matters:

- a) parking and turning for vehicles of site personnel, operatives and visitors
- b) loading and unloading of plant and materials
- c) piling techniques (if applicable)
- d) storage of plant and materials
- e) provision and use of wheel washing facilities
- f) programme of site and all associated works such as utilities including details of traffic management necessary to undertake these works
- g) site working and delivery times
- h) a communications plan to inform local residents of the program of works
- i) provision of boundary hoarding and lighting
- j) details of proposed means of dust suppression
- k) details of measures to prevent mud from vehicles leaving the site during construction
- l) haul routes for construction traffic on the highway network and
- m) monitoring and review mechanisms.
- n) Details of deliveries times to the site during construction phase.

Reason: In the interest of highway safety to avoid the hazard caused by mud on the highway and to ensure minimal adverse impact on the public highway during the construction phase.

Yours sincerely,

**Ben Chester**  
**Senior Transport Planning Engineer**

Growth, Highways and Infrastructure

**From:** Chris Ward

**Sent:** 22 December 2021 16:23

**Subject:** RE: MSDC Planning Consultation Request - DC/21/06824

Dear Mahsa,

Thank you for consulting me about the proposed poultry house development in Stradbroke. On reviewing the documents submitted, I have no comment to make as no Travel Plan has been submitted.

Kind regards

**Chris Ward**

Active Travel Officer

Transport Strategy

Strategic Development - Growth, Highways and Infrastructure

Suffolk County Council



FAO: Planning Department,  
**Babergh Mid-Suffolk District Council**

Ref: DC/21/06824  
Date: 13/01/2022

## HISTORIC BUILDINGS AND CONSERVATION ADVICE

Dear Sir / Madam,

### **RE: LAND AT FENNINGS FARM PIXEY GREEN STRADBROKE SUFFOLK**

This application is for the erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development).

The heritage statement accompanying the application describes the impact of the scheme on the nearby designated and undesignated heritage assets. It concludes that the development would result in less than substantial harm to the significance of the Grade II Listed Old Hall Cottage (List UID: 1182816) and that this harm would be at the lower end of the scale. This impact is due to the visibility of the proposed sheds, within the wider setting of the Listed cottage. The Heritage Statement also concludes that there would be no impact on the significance of the other heritage assets, due to separation and the lack of visibility.

In general, I agree with this assessment of the scheme's visual impact. However, the impact on a heritage assets setting cannot be limited to views alone. Other environmental factors, such as noise, increased traffic, vibrations, dust, light, etc, all will have an impact on the setting of a heritage asset.

The Noise Impact Assessment was carried out by Matrix Acoustic Design Consultants and while their assessment does not specifically target the nearby heritage assets, in general they can be considered to be included within the areas assessed. The noise impact assessment states that the majority of transport movements will occur during the working day (07:00 – 20:00hrs), presumably with a minority of further movements also occurring outside of the working day hours. It also states that "*the cumulative noise emissions from roof extract fans with the addition of transport activities would still be below the typical background noise level (low noise impact) and result in very low noise ingress levels.*". I conclude from this that there will be a low level of negative impact, due to noise and traffic, particularly on heritage assets closest to the development site.

An assessment of the impact of odours was carried out by Redmore Environmental. The assessment area covered included the majority of the designated and non-designated heritage assets and the subsequent report concludes that the "*predicted impacts was defined as slight at nine receptors and negligible at one position. In accordance with the stated guidance, the overall odour effects as a result of emissions from the expanded poultry unit are considered to be not significant.*" I conclude from this



that there is likely to be a negligible impact on the setting and significance of the heritage assets, from the odours associated with the operation of the development.

Therefore, the scheme would potentially result in a low level of less than substantial level of harm to the nearby designated heritage assets, due to the negative effect on environmental factors (noise) on their setting, along with a low level of less than substantial level of harm resulting from the detrimental visual impact specifically on the Grade II Listed Old Hall Cottage.

The national Planning Policy Framework (NPPF) states that any harm to, or loss of, the significance of a designated heritage asset, including from development within its setting, should require clear and convincing justification (paragraph 200). In paragraph 206 the NPPF states that local planning authorities should look for opportunities for new development within the setting of heritage assets, to “*enhance or better reveal their significance*”. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably. I do not find that the proposed development enhances or preserves the positive elements of the setting of the nearby heritage asset and I do not believe the negative impacts of the scheme could be successfully mitigated.

Therefore, the result of the development would be a low level of less than substantial harm to the nearby heritage assets, which would need to be weighed against the public benefits of the proposal, in accordance with Paragraph 202 of the NPPF.

David Sorapure  
Built Heritage Consultant  
Place Services

*Note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter*

**From:** Hannah Bridges

**Sent:** 11 January 2022 13:43

**Subject:** Planning Application DC/21/06824

Good Afternoon,

Waste Services has no specific comments in relation to this planning application.

Kind regards

Hannah Bridges

Waste Management Officer - Waste Services

Mid Suffolk and Babergh District Councils - Working Together

**From:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

**Sent:** 13 Sep 2022 09:40:28

**To:**

**Cc:**

**Subject:** FW: DC/21/06824 poultry houses, committee item

**Attachments:**

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**From:** Hamish Jackson - Ecological Consultant <[Hamish.Jackson@essex.gov.uk](mailto:Hamish.Jackson@essex.gov.uk)>

**Sent:** 12 September 2022 12:57

**To:** Mahsa Kavyani <[Mahsa.Kavyani@babberghmidsuffolk.gov.uk](mailto:Mahsa.Kavyani@babberghmidsuffolk.gov.uk)>; Sue Hooton, Principal Consultant Ecologist <[sue.hooton@essex.gov.uk](mailto:sue.hooton@essex.gov.uk)>

**Cc:** Julie Havard <[Julie.Havard@babberghmidsuffolk.gov.uk](mailto:Julie.Havard@babberghmidsuffolk.gov.uk)>; Gemma Walker <[Gemma.Walker@babberghmidsuffolk.gov.uk](mailto:Gemma.Walker@babberghmidsuffolk.gov.uk)>; Gen Broad - Ecological Consultant <[Gen.Broad@essex.gov.uk](mailto:Gen.Broad@essex.gov.uk)>

**Subject:** RE: DC/21/06824 poultry houses, committee item



**EXTERNAL EMAIL: Don't click any links or open attachments unless you trust the sender and know the content is safe. Click [here](#) for more information or help from Suffolk IT**

Good afternoon Mahsa,

I have had a look through the further Ammonia Assessment and can confirm that the updated assessment demonstrates that there is unlikely to be any impact upon the Chippenhall Green Site of Special Scientific Interest (SSSI) from increased Ammonia. This is because the report appears to be completed appropriately and the predicted impacts will be below 1% in-combination assessment threshold.

However, as we are not air quality experts, we recommend that Natural England should provide a further consultation response, before we provide formal comments on this matter. Therefore, I note that their comments were expected on the 6<sup>th</sup> September, so have you had any update on when these comments will be provided?

This is the only outstanding matter for ecology and we will recommend conditions for a CEMP, LEMP and Wildlife Sensitive Lighting if the LPA is minded to approve the application.

Let me know if you have any queries,

Kind regards,

Hamish

**Hamish Jackson** ACIEEM BSc (Hons)  
**Ecological Consultant** at Place Services

telephone: 03330 320980 mobile: 07740901139

email: [hamish.jackson@essex.gov.uk](mailto:hamish.jackson@essex.gov.uk) / [PlaceServicesEcology@essex.gov.uk](mailto:PlaceServicesEcology@essex.gov.uk)

web: [www.placeservices.co.uk](http://www.placeservices.co.uk)

linkedin: [www.Linkedin.com/in/hamishjackson/](http://www.Linkedin.com/in/hamishjackson/)

Pronouns: He / Him





20 January 2022

Mahsa Kayvani  
Mid Suffolk District Council  
Endeavour House  
8 Russell Road  
Ipswich, IP1 2BX

By email only

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*Thank you for requesting advice on this application from Place Services' ecological advice service. This service provides advice to planning officers to inform Mid Suffolk District Council planning decisions with regard to potential ecological impacts from development. Any additional information, queries or comments on this advice that the applicant or other interested parties may have, must be directed to the Planning Officer who will seek further advice from us where appropriate and necessary.*

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**Application:** DC/21/06824  
**Location:** Land At Fennings Farm Pixey Green Stradbroke Suffolk  
**Proposal:** Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)

Dear Mahsa,

Thank you for consulting Place Services on the above application.

**Holding objection due to insufficient ecological information upon statutory designated sites (Chippenhall Green Site of Special Scientific Interest)**

**Summary**

We have reviewed the Ecology Report (Wild Frontier Ecology Ltd, December 2021) and the Ammonia Assessment (Redmore environmental Ltd, October 2021), submitted for the applicant, relating to the likely impacts of development on designated sites, protected and priority species / habitats.

We are not satisfied that there is sufficient ecological information available for determination.

We note the close proximity of Chippenhall Green Site of Special Scientific Interest (SSSI), which is a lowland meadow with calcareous clay soil that is highly sensitive to an increase of NH<sub>3</sub> emissions. As a result, we have reviewed the Ammonia Assessment (Redmore environmental Ltd, October 2021) and note that the assessment only considers impacts from increased NH<sub>3</sub> emissions from the development alone and has not considered potential impacts in-combination assessment of other plans and projects. This is a requirement for all SSSI's and Habitats Sites (Special Protection Areas, Special Areas of Conservation and Ramsar Sites). As a result, the Ammonia Assessment will need to be updated to consider likely impacts from all plans or projects, which are likely to be relevant to this application.





In addition, we note that the Planning Statement (Parker Planning Services, November 2021) submitted within this application states that each shed will contain 51,300 chickens, whereas the Ammonia Assessment report (Redmore Environmental, October 2021) states that 6 poultry sheds containing 48,913 chickens. As a result, the modelling will need to be re-calculated using the maximum capacity of poultry within each broiler shed.

However, it is indicated that we do support the measures identified in Ecology Report (Wild Frontier Ecology Ltd, December 2021) and are satisfied that impacts can be avoided for Great Crested Newt, which is known to be present within the immediate vicinity of the site.

Therefore, this further information is required to provide the LPA with certainty of impacts on designated sites and enable it to demonstrate compliance with its statutory duties.

We look forward to working with the LPA and the applicant to receive the additional information required to overcome our holding objection.

Please contact us with any queries.

Yours sincerely,

**Hamish Jackson ACIEEM BSc (Hons)**

Ecological Consultant

[placeservicesecology@essex.gov.uk](mailto:placeservicesecology@essex.gov.uk)

**Place Services provide ecological advice on behalf of Mid Suffolk District Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

**From:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

**Sent:** 08 Aug 2022 09:40:27

**To:**

**Cc:**

**Subject:** FW: PLANNING APPLICATION: DC/21/06824 STRADBROOKE - SECOND MEMO

**Attachments:**

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**From:** Susan Lennard <Susan.Lennard@babberghmidsuffolk.gov.uk>

**Sent:** 08 August 2022 09:32

**To:** BMSDC Planning Area Team Yellow <planningyellow@babberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@babberghmidsuffolk.gov.uk>; Susan Lennard <Susan.Lennard@babberghmidsuffolk.gov.uk>

**Subject:** PLANNING APPLICATION: DC/21/06824 STRADBROOKE - SECOND MEMO

**PLANNING APPLICATION: DC/21/06824**

**OUR REFERENCE: 310391**

**PROPOSAL: Re consultation (Submission of Ammonia Assessment) Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)**

**LOCATION: Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk**

**CONSULTEE COMMENTS: Noise, odour, light, smoke.**

Dear Sirs

I write with regard to the above planning consultation for which we have been reconsulted in respect of the submission of an Ammonia Assessment.

Having reviewed the sites planning history and associated planning documentation we would offer the following observations;

- Pixley Farm currently operates as a poultry farm with 9 sheds housing approximately 259,000 birds. Each growing cycle is 38 days with 7.5 cycles per year.
- There are a number of residential dwellings in the locality which are privately owned and occupied. The closest of these is approximately 415 metres to the east.
- A Scoping Opinion was issued in April 2021.
- This service provided the following comments in respect of the scoping opinion;

*Having reviewed the submitted proposal and the Parker Planning Services scoping report dated March 2021 I am satisfied that the odour and ammonia methodology is acceptable. Can I ask that the consultants confirm whether the assessed levels will incorporate the existing on site poultry houses to show the overall effect from the site as the combined emissions will form part of the same operation.*

- The units would be ventilated with ridge mounted fans. Gable end fans are also proposed to be used when temperatures exceed 28 degrees or in the event of ridge fan failure.
- **An odour assessment has been undertaken by** Redmore Environmental (13<sup>th</sup> October 2021), which outlines: **“potential odour releases were defined based on the size and nature of the existing and proposed rearing operations. These were represented within a dispersion model produced using ADMS-5. Impacts at sensitive receptors in the vicinity of the site were quantified, the results compared with the relevant odour benchmark levels and the significance assessed in accordance with the IAQM guidance. Predicted odour concentrations were below the relevant EA odour benchmark**

**level at all receptor locations for all modelling years. The significance of predicted impacts was defined as slight at nine receptors and negligible at one position. In accordance with the stated guidance, the overall odour effects as a result of emissions from the expanded poultry unit are considered to be not significant.**

- The site is permitted by the Environment Agency (Permit No EA/EPR/BP3633UQ/V006).
- Waste will be removed directly from sheds onto covered lorries, there is no interim site storage.
- A diverter valve will direct foul water arising from site to sealed underground storage tanks pending removal by contractor from site.
- No details have been provided in relation to storage or disposal of dead birds.
- An Ammonia assessment has been provided by C.E Davidson
- A noise assessment in accordance with BS4142:2014 has been undertaken by Matrix Acoustic Consultants (May 2021) . The report concludes that
  - ***The BS4142 noise impact of the extract fans and transport activities during the day and evening will be low (with the contribution of the gable end fans) to very low (without the gable end fans).***
  - ***During the night the aggregate ambient noise ingress via an open window of the roof extract fans and transport activities have been established to be below the existing underlying noise environment and >10dB below BS8233's noise ingress limits for bedrooms (limits are applicable to road traffic and continuous operating plant).***
  - ***Background noise levels at Positions 1, 3 and 4 are:***
    - ***Day (07:00 – 20:00hrs): LA90 36dB***
    - ***Evening and night (20:00 – 07:00hrs): LA90 26dB***
    - ***Night (23:00 – 07:00hrs): LA90 23dB***
  - ***The individual maximum noise events generated by the HGVs loading/unloading will result in noise ingress levels via an open window below LAmax,F 45dB. In accordance with ProPG (2017) this indicates a negligible noise impact with regard to sleep disturbance.***
  - ***We therefore conclude that during the night the absolute noise levels will result in a very low noise impact.***
  - ***The Rating Levels of the roof extract fans will be at highest 10dB below the typical background noise levels during the day and evening, and result in an inaudible 3dB noise ingress.***
  - ***addition of transport activities would still be below the typical background noise level (low noise impact) and result in very low noise ingress levels.***
  - ***The cumulative noise impact of the enlarged poultry development will be low day and night.***

The farm operates under a permit issued and regulated by the Environment Agency under Environmental Permitting (England and Wales) Regulations 2016. This permit controls emissions to land air and water. The proposed expansion of the farm will require a variation to the existing permit (if this has not already been undertaken). Emissions to include noise, odours and waste should be considered as part of this variation process by the Environment Agency who we note have been consulted on this proposal.

No additional detail has been provided in respect of pest prevention and control (including flies), including interim storage and disposal of waste products. In order for this service to provide final comments we would wish to see this information provided.

Regards

**Sue Lennard**  
**Senior Environmental Protection Officer**  
**Public Protection**

**Please note I am a part time officer working each Monday Tuesday and Wednesday each week.**

**Babergh and Mid Suffolk District Councils – Working Together**

[Susan.lennard@babergmidsuffolk.gov.uk](mailto:Susan.lennard@babergmidsuffolk.gov.uk)

01449 724943

[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

**From:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Sent:** 11 Jan 2022 09:15:01

**To:**

**Cc:**

**Subject:** FW: (301701) DC/21/06824. Land Contamination

**Attachments:**

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**From:** Nathan Pittam <Nathan.Pittam@baberghmidsuffolk.gov.uk>

**Sent:** 11 January 2022 07:25

**To:** BMSDC Planning Area Team Yellow <planningyellow@baberghmidsuffolk.gov.uk>

**Cc:** Mahsa Kavyani <Mahsa.Kavyani@baberghmidsuffolk.gov.uk>

**Subject:** (301701) DC/21/06824. Land Contamination

**EP Reference : 301701**

**DC/21/06824. Land Contamination**

**Land at Fennings Farm, Pixey Green, Stradbroke, EYE, Suffolk.**

**Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development).**

Having reviewed the application I can confirm that I have no objection to the proposed development from the perspective of land contamination. I would only request that the LPA are contacted in the event of unexpected ground conditions being encountered during construction and that the below minimum precautions are undertaken until such time as the LPA responds to the notification. I would also advise that the developer is made aware that the responsibility for the safe development of the site lies with them.

Please could the applicant be made aware that we have updated our Land Contamination Questionnaire and advise them that the updated template is available to download from our website at <https://www.babergh.gov.uk/environment/contaminated-land/land-contamination-and-the-planning-system/>.

For the purposes of clarity these comments **only** relate to matters of Land Contamination.

Regards

Nathan

**Nathan Pittam** BSc. (Hons.) PhD

Senior Environmental Management Officer

**Babergh and Mid Suffolk District Councils – Working Together**

Email: [Nathan.pittam@baberghmidsuffolk.gov.uk](mailto:Nathan.pittam@baberghmidsuffolk.gov.uk)

Work: 01449 724715

websites: [www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

*I am working flexibly - so whilst it suits me to email now, I do not expect a response or action outside of your own working hours*

---

**Minimum requirements for dealing with unexpected ground conditions being encountered during construction.**

- 1. All site works at the position of the suspected contamination will stop and the Local Planning Authority and Environmental Health Department will be notified as a matter of urgency.*
- 2. A suitably trained geo-environmental engineer should assess the visual and olfactory observations of the ground and the extent of contamination and the Client and the Local Authority should be informed of the discovery.*

3. *The suspected contaminated material will be investigated and tested appropriately in accordance with assessed risks. The investigation works will be carried out in the presence of a suitably qualified geo-environmental engineer. The investigation works will involve the collection of solid samples for testing and, using visual and olfactory observations of the ground, delineate the area over which contaminated materials are present.*
4. *The unexpected contaminated material will either be left in situ or be stockpiled (except if suspected to be asbestos) whilst testing is carried out and suitable assessments completed to determine whether the material can be re-used on site or requires disposal as appropriate.*
5. *The testing suite will be determined by the independent geo-environmental specialist based on visual and olfactory observations.*
6. *Test results will be compared against current assessment criteria suitable for the future use of the area of the site affected.*
7. *Where the material is left in situ awaiting results, it will either be reburied or covered with plastic sheeting.*
8. *Where the potentially contaminated material is to be temporarily stockpiled, it will be placed either on a prepared surface of clay, or on 2000-gauge Visqueen sheeting (or other impermeable surface) and covered to prevent dust and odour emissions.*
9. *Any areas where unexpected visual or olfactory ground contamination is identified will be surveyed and testing results incorporated into a Verification Report.*
10. *A photographic record will be made of relevant observations.*
11. *The results of the investigation and testing of any suspect unexpected contamination will be used to determine the relevant actions. After consultation with the Local Authority, materials should either be:*
  - *re-used in areas where test results indicate that it meets compliance targets so it can be re-used without treatment;* or
  - *treatment of material on site to meet compliance targets so it can be re-used;* or
  - *removal from site to a suitably licensed landfill or permitted treatment facility.*
12. *A Verification Report will be produced for the work.*

**From:** Jennifer Lockington  
**Sent:** 22 December 2021 16:01  
**Subject:** DC/21/06824 - Air Quality

Dear Mahsa

YOUR REF: 21/06824

OUR REF: 301700

**SUBJECT:** Planning Application - Erection of 6no poultry houses with associated admin blocks, feed bins and ancillary development. (EIA Development)  
Land At Fennings Farm, Pixey Green, Stradbroke, Suffolk

**Please find below my comments regarding air quality matters only.**

Thank you for your consultation on the above application.

I understand that air quality has previously been scoped out of the Environmental Impact Assessment. Therefore I do not have concerns that the health based Air Quality Objectives will be exceeded because of this proposal.

I have no objections with regard to air quality.

Regards

**Jennifer Lockington (Mrs)**  
Senior Environmental Management Officer  
**Babergh & Mid Suffolk District Councils - Working Together**  
tel: 01449 724706  
[www.babergh.gov.uk](http://www.babergh.gov.uk) [www.midsuffolk.gov.uk](http://www.midsuffolk.gov.uk)

Please note - I work Tuesdays and Wednesdays