

**AH Pick & Son - Proposed Erection of Poultry Units and an Anaerobic Digestion Facility - Manor Farm, Hungarton Lane, Beeby, LE7 3BJ  
(County Council Identity Number: 2020/CM/0042/LCC)**

Dear Tony Ridley,

Hungarton Parish Council objects to the proposed Erection of Poultry Units and an Anaerobic Digestion Facility - Manor Farm, Hungarton Lane, Beeby, LE7 3BJ (County Council Identity Number: 2020/CM/0042/LCC).

The PC objected to the proposal in 2015/16. We believe that much has changed over the past 5 years in terms of planning policy and environmental standards/concerns and that the application should be considered against the current situation and not those which applied when it was approved last time.

The council has looked in detail at the EIA provided and found a number of deficiencies: An Analysis of the "Environment Statement" (Environmental Impact Assessment) July 2020 is attached with this letter. We wish to draw the following points to your attention and suggest in the strongest possible terms that the application cannot be approved without further detail being supplied and without proper assessment of impacts:

- There is insufficient information in the EIA to establish reliable feedstock consumption information and to determine whether the entire annual energy crop harvest can be ensiled on site;
- An assessment of landscape and ecological impacts of in-field silage clamps is required;
- Information is required on the storage of FYM to assess the likelihood of odour, landscape and ecological impacts;
- Details of the composition of 'other agricultural or dairy wastes', their storage and management are required;
- A fully-worked carbon budget for the proposed development is required together with a fully-worked comparison of the carbon budget for the proposed development, compared with alternative low-carbon technologies;
- Detailed protocols for the disposal of wastes are required;
- An alternative landscape impact mitigation plan is required which conserves or enhances the unique character of the landscape in which the proposed development is to be located;
- The cumulative visual impact (as well as other impacts, e.g. on traffic volumes – see below) of the proposed development at Manor Farm and recent, local agricultural developments should be considered in the Environmental Statement;
- A revised road widening scheme is required as a condition of approval and its completion should remain a pre-requisite for development of Manor Farm to start;
- An ecological survey to establish the presence or absence of great crested newts at Manor Farm is required and, if present, mitigation measures put in place to ensure their survival during the construction phase;
- A comprehensive assessment of the potential for eutrophication of Barkby Brook by the proposed development is required.

**What has changed since 2016:**

- Declarations of Climate Change Emergency by Government and local authorities;
- Scraptoft SDA approval bringing suburban growth closer to the proposed site;
- New development along Hungarton Lane, at edge the of Keyham;
- The filthy state of Manor Farm since permission was granted and the applicant's flouting of planning rules;
- Evidence of the damage that limited period diversion (Sept 2019) through Hungarton can do and implications for impact on roads/verges by this proposal;
- Recognition of the role of the countryside in wellbeing.

**New environmental/welfare issues:**

- Risks associated with AD operation;
- Tranquility at Miles Piece Nature reserve just over 300m from the proposed site;
- New RSPA research on broiler chickens suggests that many fast-growing meat chickens have a life not worth living.

**Other key issues:**

- Economic development – one new job;
- Highways – safety;
- Impact on the built heritage;
- Air quality, noise and flies;

**Declarations of Climate Change in Leicestershire:** In 2019 the Government declared a Climate Change Emergency and Leicestershire County Council, the Leicestershire Districts and Boroughs (including Charnwood Borough Council) and Hungarton PC followed. It is hard to see how the development of such a facility requiring as it does very significant heavy goods transport in terms of regular HGV movements and in terms of significant local farm vehicle movements does anything except undermine the good intentions of the climate emergency declarations. It introduces this traffic where there was previously very little. If the authorities are serious in their intention to carry through action in the light of this emergency then this proposal, which delivers very little benefit except to the applicant should be refused. This is not a sustainable proposal because it will mean increased emissions, significant food miles and pollution, contributing to climate change and ill health.

In appropriate settings anaerobic digestion makes a useful contribution to the development of non-carbon based energy generation. However in this setting any benefit is outweighed by the emissions from the transport requirements and from the broiler houses themselves.

**A fully-worked carbon budget for the proposed development is required together with a fully-worked comparison of the carbon budget for the proposed development with alternative low-carbon technologies.**

The proposal is out of kilter with the Government's 25 Year Environment Plan which looks forward to natural capital improving people's health and wellbeing.

According to CPRE Charnwood, Charnwood Borough Council have already achieved more than double their renewable energy target so there is no requirement for this application to be approved based on renewable energy targets.

The application is a poor fit with the County Council's Environment vision: *"We will minimise the environmental impacts of its own activities and will contribute to the improvement of the wider environment through local action. We will continue to play a significant role in protecting and enhancing the environment of Leicestershire, meeting the challenges and opportunities of climate change, and seeking to embed environmental sustainability into both social and economic development in the county"*

Charnwood Borough Council's Draft Local Plan (Climate change section) requires renewable energy developments to

- demonstrate that, following consultation, the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.
- Ensure setting of heritage assets, noise and odour, the wider landscape, biodiversity and public safety have been fully addressed.

The applicant has not engaged with the Hungarton community on this application. There are risks to public safety by introducing hundreds of new HGV movements to roads currently used as much by horse riders, cyclists and other recreational users as cars, there is a risk to the biodiversity at nearby Miles Piece and a risk to heritage (see below).

**Scraptoft SDA:** HDC has now approved the Strategic Development Area at Scraptoft of 1200 houses built on the site of Scraptoft Golf Course, off Beeby Road. This was not envisaged at the time of the original planning application. On the proposed plan for the SDA significant traffic calming measures are to be put in place along Beeby Road making it even more unsuitable for large HGVs. Complaints about odour and flies are likely to increase as the population of the area grows.

**New development on Hungarton Lane, Keyham:**

Since the original 2015 planning application was submitted, development has been allowed along this section of Hungarton Lane, with both a livery at "Walkers Stables" and some domestic accommodation at "Cobs Farm". Also, since 2015, further liveries have been developed in and around Keyham village, which have resulted in even more animals being exercised along, or kept in fields alongside, the proposed access route to Manor Farm.

**Farm management:** The 25 year Environment Plan includes aspiration to achieve zero avoidable plastic waste yet since 2016 the Manor Farm site has introduced a huge amount of plastic waste to the countryside. The applicant covered a field adjacent to the site with large plastic wrapped clamps – we presume in readiness for the AD unit. He then moved the contents leaving the plastic on site from where it blew across the countryside draping hedgerows and clogging ditches. There have been complaints to Charnwood BC.

As the applicant has demonstrated a disregard for local residents, visitors and the environment over the last 5 years we do not think he should have this application approved.

Hungarton PC had correspondence with Phil Larter at the County Council in 2017 regarding the Combined Heat and Power Unit (part of the Anaerobic Digester) which was sited near the road without planning permission. This doesn't inspire confidence

in the applicant's attitude to following the rules of any planning consent granted.

**Damage to roads:** Concerns have been raised with Leicestershire Highways (Sep 2019) regarding the state of the road surface and verges, following the damage caused by traffic flows along the diversions that had occurred temporarily whilst works were being carried out in Keyham by Severn Trent Water. Leicestershire Highways are simply not maintaining the Hungarton Lane verges. If a temporary road closure in Keyham which diverted traffic for a couple of weeks past the proposed site was devastating because the roads are too narrow to allow such levels of traffic, how much more damaging will it be with the increase in HGV and local tractor and trailer traffic bringing material to feed the AD?

**The role of the countryside in wellbeing:** The Government's 25 year environment plan advocates *"Spending time in the natural environment – as a resident or a visitor – improves our mental health and feelings of wellbeing. It can reduce stress, fatigue, anxiety and depression. It can help boost immune systems, encourage physical activity and may reduce the risk of chronic diseases such as asthma. It can combat loneliness and bind communities together."*

It has been very noticeable during the Covid19 pandemic that many more people are coming out of the city to enjoy the countryside in this corner of High Leicestershire. This development is not appropriate for this area.

**AD risks:** In **A Review of Environmental Incidents at Anaerobic Digestion (AD) Plants and Associated Sites between 2010 and 2018** the Environment Agency reports that according to a leading AD plant insurer, *"Anaerobic digestion plants may experience significant loss events during operation resulting from damage to operational equipment, structural collapse, fire, flood or theft. These events can often result in lengthy periods of process downtime, with a consequential loss of revenue, clean-up costs, risk of local pollution and a resulting drop in local community confidence and support for the project; which can be difficult to rebuild."*

*It is essential that all plant operators, and those involved in its maintenance, fully understand the risks that are present on an AD plant, and why these safety and control features are provided. They need to be aware of the consequences of safety feature failures, incorrect plant operation and not following set procedures. Human error is often the root cause of many major loss or damage events."*

[https://consult.environment-agency.gov.uk/environmental-permitting/standard-rules-consultation-no-20/user\\_uploads/incidents-report--2010-2018--final.pdf](https://consult.environment-agency.gov.uk/environmental-permitting/standard-rules-consultation-no-20/user_uploads/incidents-report--2010-2018--final.pdf)

The PC and Hungarton residents are concerned that an accident could lead to significant environmental damage, affecting Miles Piece and Barkby Brook.

**Tranquility at Miles Piece:** The proposed development is less than 500 m from the tranquillity of Miles Piece, the only Leicestershire and Rutland Wildlife Trust site in this part of Leicestershire. This "sensitive receptor" may be affected by noise, air pollution and leakages into Barkby Brook which runs along one side of the site.

**Animal welfare:** The RSPA's recently published research *Eat.Sit.Suffer.Repeat.* reveals the suffering endured by fast-growing meat chickens, many of whom struggle to perch or even walk properly by the end of their short lives. It recommends switching to a slower growing, higher welfare breed. Not only does it have a positive impact on welfare, it also results in less waste. As demonstrated by the trial, the

production of chicken meat using conventional meat chicken breeds is a wasteful and ethically questionable business as the higher mortality, higher culls, and poorer meat quality brings into question the sustainability of this enterprise.

**Economic development:** The proposal creates 1 job. It will make no contribution to local economic development, in fact it is likely to have a very negative impact on the local pubs, B&Bs, and holiday chalets as people will not enjoy the odours.

### **Access and Highways: Safety**

Our concerns are:

- The application states that all HGVs will be instructed to turn right out of the facility. There is no suitable HGV route to a main road; taking traffic through Baggrave, Lowesby, Hungarton or Keyham, all risk road traffic accidents and other damage. There are dangerous junctions and blind bends, cattle-grids and narrow lanes in every possible direction, including the junction with the Tilton road. The more logical route through Little Beeby is no better.
- The 7.5 tonne weight restriction is there because these roads lack the depth of construction and the width necessary to support heavy traffic; they are unsuitable for HGVs;
- Does Keyham Bridge have the load-bearing capacity for this volume of HGVs?
- The roads are in constant use by horse riders, cyclists and dog walkers;
- What is proposed is a huge increase in heavy traffic – some 960 HGV journeys each year - using narrow country roads day and night;
- Hungarton Lane (off which Manor Farm is located) is never gritted. Is the County Council planning to increase gritting?
- There have been several deaths on these roads in recent years;
- The HGVs would spoil the peace and tranquillity of Keyham graveyard and, depending on the route, the Natural Burial Ground;
- There is likely to be more mud on the road from bringing in fuel for the digester. Because the most frequently-used energy crop, maize, has to be harvested late in the year, when the land is wet, a lot of mud is likely be deposited on local roads by tractors and trailers.

NPPF states that development can only go ahead when “Safe and suitable access to the site can be achieved for all people; and Improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development.”

Safety is a considerable issue and the applicant’s proposals do not deliver a credible strategy for keeping all road users, including riders, cyclists and walkers, safe.

On almost every journey along Hungarton Lane towards Beeby one sees horse riders and cyclists, often in groups of 2 or 3, it is rare to meet other traffic and extremely rare to see an HGV or even a tractor.

On Fridays in wintertime Ingarsby Road is frequently congested by horseboxes from the Quorn hunt and made alarming to negotiate due to the erratic traffic movements of hunt followers. Most cars drive too fast down this road. If the development goes ahead it will need an enforceable speed restriction.

## **Impact on the built heritage**

There are 27 listed buildings and structures in Hungarton

[https://www.hungartonparishcouncil.org.uk/uploads/appendix-4-hungarton-historic-environment-listing-copy-2-\(1\).pdf](https://www.hungartonparishcouncil.org.uk/uploads/appendix-4-hungarton-historic-environment-listing-copy-2-(1).pdf)

and a number at Keyham and Beeby including Little Beeby Farmhouse (Lodge Farm) which is within 500m of the proposed site. PPS5 sets out the Government's planning policies on the conservation of the historic environment and says: "*the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration*". It is not appropriate to site this development between these historic settlements.

## **Air quality: Odour**

The Environment agency states: "You should take care to site particularly odorous activities away from neighbours. Distance helps to dilute odours and making sure that odour sources are not upwind of houses (i.e. the prevailing wind direction) helps in reducing the impact of odours."

The village of Hungarton is immediately downwind of the proposed site.

Odour from the broiler houses ventilation will start to rise at the end of the first week each "crop" is housed there. Odour output then increases and peaks on the day the sheds are mucked out. People who have been in proximity to similar units at these times report experiencing respiratory distress, including gagging.

## **Air Quality: dust**

Dust particles leave through the ventilators in the sheds and are carried by the wind and, because the prevailing wind is westerly, most probably to Hungarton. There are implications to human health.

## **Noise**

Noise is assessed in the Environmental Statement assessed as moderately significant.

The National Planning Policy Framework determines the government's planning policy for England. The NPPF states that, with respect to noise, planning policies and decisions should aim to:

- **Identify and protect areas of tranquility which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.**

## **Flies**

Anecdotally people who have experienced these broiler units say the fly problem is severe.

## **Landscape and visual impact**

CPRE has voiced concerns about the proposals being visually intrusive and think that the impact on landscape has not been satisfactorily addressed. The site is clearly visible from Ingarsby Road as it passes through Keyham. Is this an appropriate development in High Leicestershire (our area as defined in the National Character Area)?

*“This landscape of broad, rolling ridges and secluded valleys has a quiet, remote and rural character with small villages and scattered farms. The predominantly rural character of the area comprises undulating fields with a mix of pasture on the higher, sloping land and arable farming on the lower, flatter land. Fields are divided by well established hedgerows, with occasional mature hedgerow trees. A network of narrow country lanes, tracks and footpaths connect across the landscape interspersed by small thickets, copses and woodlands. Extensive views from the higher ground reveal a pattern of small attractive villages, hamlets and farm buildings set within an agricultural landscape, with traditional churches acting as distinctive features of the settlements.”*

There have been three other large agricultural developments within a few km that are impacting dramatically on the character and appearance of this vulnerable landscape. We note that each of the proposed chicken houses, at 104m x 24.7m are TWICE the length and width as the cattle sheds built recently at Quenby Lodge Farm, a mere 3 km away.

**Saved policy EV/41 of the Charnwood Local Plan 2004 states that:**

**“Planning permission will be granted for development for renewable energy schemes provided:**

- i) the proposal would not have an adverse effect on the character or appearance of the locality;**
- ii) there would be no adverse impact on adjoining land-uses or residential amenity;**
- iii) features of natural, cultural, historical and archaeological interests would be safeguarded;**
- iv) the proposal would not result in unacceptable levels of vehicular traffic on minor roads.”**

In conclusion, we consider that planning permission cannot be granted for the combined poultry factory and anaerobic digester because of the impact on residential amenity, wildlife sites Climate Change and unacceptable levels of HGVs on minor roads.