

Grimley Parish Council

Clerk: Mrs Lisa Stevens

Tel: 01905 820956

Email: clerkgrimleypc@gmail.com

9 The Limes
Kempsey
Worcester
WR5 3LG

05/02/2019

Environment Agency
Permitting and Support Centre
Land Team
Quadrant 2
99 Parkway Avenue
Sheffield
S9 4WF

Environmental Permit Application Ref: **EPR/WP3239EK/V003** - An OBJECTION in respect of the environmental permit application received from JH and JM Hickton for Thorngrove Poultry Farm, WR2 6NP. (Refer to Items 3 onwards below)

AND

Environmental Permit Application Ref: **EPR/WP3239EK/V003** - An OBJECTION to the way this consultation has been carried out. (Refer to Items 1, 2 & 3 below)

This environmental permit application was discussed at Full Parish Council on 21st January 2019. The following objections were raised in open forum by residents and Councillors and formally supported by Councillors via council vote.

The overview provided on the EA website¹ lists those categories that can be taken into account when responding to consultations. For ease I have therefore coloured coded the Parish Council responses in order to demonstrate which category is relevant:

A	Relevant environmental regulatory requirements and technical standards.
B	Information on local population and sensitive sites.
C	Comments on whether the right process is being used for the activity, for example whether the technology is the right one.
D	The shape and use of the land around the site in terms of its potential impact, whether that impact is acceptable and what pollution control or abatement may be required.
E	The impact of noise and odour from traffic on site.
F	Permit conditions by providing information that we have not been made aware of in the application, or by correcting incorrect information in the application (e.g. monitoring and techniques to control pollution).

¹ https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/?fbclid=IwAR3yooRyabfT0IGlpRzpqyz7c7UiHStbRym1hgfBXjYnm8_h-R3W7msRN64

1) Consultation process I

Grimley Parish Council wishes firstly to express its disappointment that most residents in proximity to the application site **have not been consulted at all**.

i.	Three households included in the 21 properties listed in the Noise Management Plan ² and on the Site Plan ³ have formally notified the Parish Council that they have <u>not</u> been informed of the consultation and many more have verbalised the same.	Non consultation
ii.	Historical complaints ⁴ relating to the broiler farm indicate clearly that the odour, noise and particulate pollution from this site has regularly travelled further than these 21 properties mentioned above. Section F of the Consultation Principles states that <i>"consultations should be targeted and should consider the full range of people, business and voluntary bodies affected."</i> Those that have had input into previous consultations on the site and those that have had cause for complaint regarding the site and ALL properties that abut the land should be included in this consultation.	Breadth of consultation unsuitable
iii.	The email received from Kirsty Wise, Customers and Engagement Officer - West Midlands, states that the consultation includes <i>"residents who have shown interest in this site previously"</i> . Residents who confirm that they have previously shown interest to the EA, have nonetheless stepped forward to say that they have not been consulted in this latest application. This indicates that there has been a failure in procedure.	Officers/staff unaware of lack of effectiveness of consultation process.

Action required: The consultation period needs to run again and a more appropriate range of households consulted.

² https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Noise%20Management%20Plan.pdf

Page one.

³ https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Site%20Plan.pdf

⁴ 128 written objections in respect of a Planning Application for the erection of additional, two-storey poultry sheds, made to Malvern Hills District Council during their statutory consultation period in 2010. This excludes additional objections from two Parish Councils and a subsequent Planning Refusal by MHDC.

2) Consultation process II

Grimley Parish Council also expresses disappointment that the residents in proximity to the application have not been consulted **in a timely and appropriate fashion.**

i.	The application paperwork shows that the Environment Agency received this application on 27 th September 2018. The public consultation period only began on 11 th January 2019. This delay of four months is unexplained and has the unfortunate and entirely avoidable consequence of causing a clash with the forthcoming national election timetable – thereby significantly reducing the amount of time available for public consultation. This clash was entirely avoidable, since national timetables are known to the EA well in advance. I refer again to the fact that this application was made as long ago as in September 2018.	Delay explanation missing and has consequences for the consultation timetable.
ii. & iii	Contrary to the Government 'Consultation Standards' ⁵ adopted by the EA ⁶ , the public consultation period in this instance is extremely short – a window of only four weeks. In no way is this a suitable consultation period for an application of this nature and when considering the size and amount of supporting paperwork submitted by the applicant and when considering the breadth of technical and legislative knowledge required to understand much of it. The EA will be well aware that residents have previously sought extensive and detailed legal advice on historical applications at this site. It should have been clearly anticipated that such would be the case again. The length of the consultation period will categorically have reduced the quality of the responses in this instance. A significant proportion of the residents have acknowledged to the Parish Council that they do not have the resources or expertise to understand many of the Assessments and Plans included.	Inappropriately short consultation period Reduced quality of public responses
iv.	Letter sent to all consultees makes no mention of the range of documents available on the EA website. It only refers to the link to the gov website, which contains a summary of the consultation dates. Local consultees only found out about the full list of consultation documents via the parish council Facebook site. It should not be left to third parties to appropriately publicise the range of consultation material. It should not be left to the consultees to conduct a google search on the off chance that more material might be available elsewhere. A copy of this letter is attached for reference Appendix 1.	Consultees not informed of the full range of application documents.

Action required: The consultation period needs to run again or be extended. This consultation response from Grimley Parish Council will later go on to discuss the public impact that this site already has on local residents. It will therefore be necessary for the EA to accept that circumstances make a more thorough consultation absolutely essential **on the grounds of safeguarding public health**⁷. Additional consultation is possible, regardless of the national election timetable.

⁵ 'Consultation Principles 2018', published by Gov.uk here: <https://www.gov.uk/government/publications/consultation-principles-guidance>. Section E - Consultations should last for a proportionate amount of time. Consulting too quickly will not give enough time for consideration and will reduce the quality of responses.
file:///C:/Users/Grimley%20Parish%20pc/Documents/Planning%20Apps/Thorngrove%20chicken%20farm/Consultation_Principles_1_.pdf

⁶ 'About this consultation' published by EA – "We are running this consultation in accordance with the criteria set out in the government's Consultation Principles".
https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/?fbclid=IwAR3yooRyabFT0IGlpRzpqyZ7c7UjHStbRym1hqfBXjYnm8_h-R3W7msRN64

⁷ 'Consultation Principles 2018', published by Gov.uk here: <https://www.gov.uk/government/publications/consultation-principles-guidance>. Section K states that "Consultation exercises should not generally be launched during local or national election periods [but] If exceptional circumstances make a consultation absolutely essential (for example, for safeguarding public health), departments should seek advice from the Propriety and Ethics team in the Cabinet Office".

3) Historical consultation process. Previous consultation methodologies were flawed and the ongoing consequences of this are not accounted for in this latest consultation.

i.	<p>The EA will be well aware that when this site initially converted to an intensive poultry farming unit, the issue of environmental care and management in relation to planning matters lay with the District Council (2006⁸). Consultations responses were received by that Council, as were complaints relating to odour, noise and particulate pollutants. Subsequently, responsibility was transferred from the District Council to the Environment Agency, but the responses and concerns of residents were never transferred⁹. This omission had consequences in 2010.</p> <p>Duly, in 2010, an application to vary the permit to increase the number of poultry places to 319,990 (to include a total of 8 poultry houses) and the associated planning permission were turned down by the District Council. In 2012, an Appeal to the Planning Inspectorate for this permission was granted, WITHOUT the Planning Inspector taking into consideration the written, firmly expressed objections of those living closest and to the North and North-East of the Poultry Houses. The Inspector had been informed, erroneously that, these residents lived in properties owned by Thorngrove and "closely associated" with the Poultry business and whose concerns should therefore; "not be afforded undue weight"¹⁰</p> <p>The Planning Inspector and the Planning Inspectorate's Quality Assurance Department subsequently acknowledged that this was an error, for which their Quality Assurance Dept offered written apologies, saying "We are very sorry for this error which has been brought to the attention of the Inspector and his professional managers." They could not estimate the impact on the Appeal that this false information had and apologised that their investigation into the matter came after the window had closed for an appeal in the High Court and to the Secretary of State.¹¹</p> <p>The EA tried to ameliorate matters somewhat by declining to activate licences¹² unless and until the applicant addressed the large volume of complaints regarding odour (substantiated) and noise already being generated by the existing licence for 110,000 chickens and the multiple breaches to its existing License. The applicant therefore delayed building the new, double storey poultry houses that had gained permission on appeal based on false information.</p> <p>The applicant instead, continued with the existing four sheds up until this day. Residents report that their concerns have slowly, partially and inconsistently been addressed by the applicant, but not before a significant amount of odour, noise, particulate pollution and stress (all of which are lifestyle changing) have been caused.</p>	Flaws in historical consultation processes, which have resulted in a currently unacceptable level of environmental and human impact – all of which are unfortunately baselines for this latest application.
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⁸ Application EPR/TP3436MF/A001. Duly made 22/12/06. Application for an intensive farming poultry installation permit.

⁹ Multiple conversations between a number of residents and the EA Officer dealing with the Planning Application. This was accepted knowledge and not contested at the time.

¹⁰ 7 November 2012, APP/J1860/A/12/2167224 Planning Inspectorate Appeal Decision. Copy held by Parish Clerk.

¹¹ PI Quality Assurance Dept Kathryn Hole Emails on file held by local resident. In reference to APP/J1860/A/11/2167224.

¹² Intensive poultry rearing for >40,000 chickens requires an A1 Installation Environmental Permit/License from the Environment Agency which they subsequently manage and monitor according to a set of standards. It is reported that the EA was having to attend the Thorngrove poultry farm so many times that the Thorngrove fee to the EA was in the highest band available for its license.

Permissions for the present farming unit have been arrived at via a flawed and ineffectual application, consultation and appeal processes. Residents ask that this situation be acknowledged and considered during this latest consultation process.

Action required: Acknowledge that all historical procedures have been obscured and ineffectual and have resulted in this latest application which, were it a new application would be unquestionably refused, and therefore act accordingly; to call for a comprehensive review of all current activity on site.

4) Current planning application timescales and time allotted for fulfilment of appeal conditions may have expired.

- i. The question of whether existing planning permissions on site have expired will need to be double checked. At the time of writing, the Parish Council and residents are not aware that any foundations or breaking of the soil for these additional broiler sheds has actually taken place. The Planning Inspectorate's decision to grant the appeal in September 2012 had a number of conditions attached, first of which was that, "The development hereby permitted shall begin not later than three years from the date of this decision."¹³. Additionally, there's a raft of submissions that should be made to the Planning Dept BEFORE development commences.

Action required: Check current planning status and planning appeal conditions and whether this affects this latest application.

5) Application form completed by the applicant has many sections where information is missing or omitted.¹⁴

- i. Section 2b – 'Summary of proposed changes.'¹⁵

The statement included by the applicant that "*The revised installation will consist of eight poultry houses for the production of broilers, bird place numbers will be unchanged at 319,990.*" is incorrect, as bird numbers have only ever been a maximum of 120,000. The site has never housed 319,990, has never had the facility to house this number. The effects of 319,990 birds on the site, environment and local residents is untested and unacknowledged. Additionally, the configuration of the proposed houses is untested. The impact of double storey house configuration on odour and noise levels and on the amenity of residents and the local environment as a whole, is unknown and cannot be shown to be within acceptable parameters. Nor can it be known that existing BAT technology or mitigation techniques will work on this untried and untested house configuration.

This section is contradicted by section 8d, which gives the revised number.

Summary of current site conditions is misleading and incorrect.

¹³ Ref The Planning Inspectorate. Appeal Decision. Ref: APP/J1860/A/12/2167224

¹⁴ Please refer to the Application Form: https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Application%20Form.pdf

¹⁵ https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Proposed%20Changes.pdf

ii.	<p>Section 2b – ‘Summary of proposed changes.’</p> <p>The statement included by the applicant that “<i>all management plans are current with no changes planned</i>” is in error and directly contravenes section 8b of the Application Form, which states “<i>Where there are sensitive receptors within 400 metres (100 metres for dust) of the installation boundary or there has been a history of odour or noise complaints, you must assess the potential impact of odour, noise or dust and bio-aerosol emissions. If this applies, you must provide updated odour and noise management plans.</i>”</p> <p>Residents would respectfully submit that the current management plans are wholly ineffectual at mitigating odour, noise and particulate pollution arising from 120,000 birds and associated equipment and so even if there are indeed currently no changes to existing management plans, then there ought to be, when considering an increase in bird numbers by 199,990.</p>	<p>Management plans are based on a bird population of 120,000 and not 319,990.</p>
iii.	<p>Section 2b – ‘Summary of proposed changes ‘</p> <p>Document states “Example picture attached” – Picture is not attached and is missing.</p>	<p>Illustration missing.</p>
iv.	<p>Section 2c – ‘Type of Variation.’</p> <p>Answer is given by applicant as ‘normal variation’. The Parish Council disputes this. The fact that the maximum number of chickens that has ever been on site is 120,000, means that this latest application should rightly be viewed as a ‘significant variation’. The difference between 120,000 and 319,990 is such that the capacity for unwanted effects on the environment and the local population is currently unconsidered, unexplored and wholly (and inappropriately) disregarded by this application. (Nb The effects that the current baseline 120,000 chickens has on the local population and the environment will be explored elsewhere in this response document).</p>	<p>Variation is ‘substantial’ for purposes of environmental and resident impact, since original app has never been realised.</p>
v.	<p>Section 6 – ‘Environmental risk assessment.’</p> <p>Applicant has stated ‘N/A’. The Parish Council would request that an environmental risk assessment, including ammonia risk assessment and modelling, is completed before this application is taken further - there are brooks on site that run into the River Severn.</p>	<p>Omitted to conduct an ERA</p>
vi.	<p>Section 8e – ‘Does this variation result in changes to the slurry or manure management?’</p> <p>Applicant has answered ‘no’. At the very least, the additional animals on site must generate more manure and so removal from site will be occurring more frequently. Greater quantities of manure will be stored on-site for up to 3 days per cycle, in addition to the clear out day. This is a change to the manure management on site, must be documented and mitigated appropriately and section 8 of the Application Form should be completed.</p> <p>Current odour levels are frequently above the tolerance levels for local residents and for those living in the more distant homes of Sinton Green village and the neighbouring village of Hallow. Any increase in manure levels, will increase the amount of time taken to remove it off site and increase the exposure of the substance to the air – all resulting in an increase in number of days of high odour experience, if not to the actual intensity of the smell.</p>	<p>Increase in manure production not sufficiently addressed by applicant.</p>

vii.	<p>Section 10 – ‘Environmental impact assessment.’</p> <p>The EA have previously stated that an EIA is required at this site and that this assessment would need to be revised if the farm is to expand on existing activities. It is understood that an EIA is in existence, but this document has not been made available to the Parish Council. The absence of ammonia modelling data is also of concern to the Parish Council.</p>	Absence of EIA
Action required: Application needs amending and resubmission as a minimum.		

6) Baseline stats and information used for this application		
<p>The present position illustrated by the applicants in their paperwork does not, in the views of the residents, adequately reflect the current site conditions or the experiences and harm caused to local residents (and those living further afield than the consultation process allows). This is illustrated below.</p>		
i.	<p>Bio Aerosol Emissions at Thorngrove Farm poultry unit¹⁶</p> <p>This assessment erroneously makes no mention of the hazard associated with the creation of bedding chippings on site.</p> <p>The ‘consequence category’ of “nuisance” is an insult to those residents living with the conditions caused by the dust and associated dust related odours. ‘Nuisance’ does not in any way describe the actual harm caused to the day to day lives of residents – who cannot use their gardens, open windows or wash clothes on days when the chipper is in use. The bio-aerosols currently released from this activity cause throat irritation and particulate contamination of garden soil, flora and home grown vegetables, windows, washing etc. The 100m threshold for monitoring this emission is entirely disputed, as the dust hazard is experienced by those of further away, in all weather conditions.</p> <p>Residents would also submit that the increase in birds must necessarily result in an increase in the amount of wood chipping activities on site. Any increase in the amount of chipping will only exacerbate this issue. The mobile chipper belonging to the farm is frequently located a short distance from residential housing and runs for entire days when in use. The noise from the machinery is an additional menace that residents must currently put up with and cannot constitute part of the experience of ‘living in the countryside’ – as is so often quoted when residents complain of farming activities</p> <p>This document also makes no mention of the microbes and bio hazards associated with this type of farming. The dust is not inert and is damaging to human health. The assertion that the risks are ‘not significant if carefully managed’ is an error, as the current management processes for 120,000 birds do not successfully mitigate the issues – let alone for 319,990 birds!</p>	Assessment and mitigation of bio-aerosols has never resolved baseline issues experienced with 120,000 birds.

¹⁶ https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Bio%20Aerosol%20Assessment.pdf

ii.	<p>Emergency plan¹⁷</p> <p>This plan makes no reference to local residents whatsoever.</p>	<p>Emergency procedures should take account of effects on local residents.</p>
iii.	<p>Fugitive emissions¹⁸</p> <p>With existing licenses, current procedures (120,000 birds) should result in litter clean out over two days every six weeks. The real experience by residents is that the activity every 6 weeks takes up to four or five days, including overnight catching of poultry and loading into wagons, clear out of spent litter the following day and storage of manure on-site for three days. This is followed by chipping for new litter – resulting in an average of 43 days of throat burning odour, noise and particulate pollution per year. (120,000 birds). The first two days of each ‘session’ are usually particularly bad in relation to throat irritation. This (revised) emission document states that the applicants are planning litter clean out for “approx. 14 days per year”. This calculation cannot be accurate when the existing state of play is considered.</p> <p>With reference to Ammonia, this emissions document again refers to the erroneous understanding that bird numbers are not increasing. The reality is that the increase will be substantial and have consequences for all aspects of planning and mitigation on site. The categorisation of ‘no risk’ is therefore disputed by residents. With reference to Ammonia, this emissions document erroneously states that “no litter will be stored on site”. This is not the experience of local residents who are aware that litter is stored on site for up to three days at a time.</p> <p>The land that the farm is located on is a ‘Nitrate Sensitive Zone’ and so the consequences of increases ammonia are significant and are underestimated by this application.</p> <p>Residents dispute that the current levels of flies are not significant. Local experiences indicate that flies are an unmanaged, regular and sustained menace, depleting what is left of their mental resilience.</p>	<p></p>
iv.	<p>Noise and Vibration and Noise Management Plan¹⁹</p> <p>This document erroneously states that chipping does not happen on site. As previously discussed, the chipper is a regular, sustained and inescapable menace to local residents. The chipper may indeed have been swapped for more modern equipment, but this has in no way reduced the level of noise. If anything, since new equipment was purchase, the chipper is used for longer periods of time. Please cross reference this with the Noise Mitigation Plan, which states that chipping occurs on site between 8am and 5pm (times disputed by residents).</p> <p>As previously stated, the litter clean out can be clearly heard by residents, including overnight. Current mitigation is not effective at reduced noise pollution. The Noise Management Plan indicates/suggests that no activity take place after 7pm, but this is not the experience of local residents.</p>	<p></p>

¹⁷ https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Emergency%20plan.pdf

¹⁸ https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Fugitive%20Emissions.pdf

¹⁹ https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Noise%20and%20Vibration.pdf

	<p>Local residents have never seen nor had access to a complaint form, nor have they been provided with the formal complaints procedure – nor, to the Parish Council’s knowledge, has there ever been a single example of proactive measures undertaken by the farm to speak to residents about the problems</p> <p>With reference to the complaints procedure’ – who ‘substantiates’ noise complaints and are they a neutral third party?</p>	
v.	<p>Odour Assessment and Odour Management Plan²⁰</p> <p>This document states that “carcasses are placed in sealed containers awaiting regular collection by a licensed renderer.” However, the experience of local residents is that carcasses are regularly burned on site, with the accompanying smell and throat irritation.</p> <p>The Odour Management Plan states that “Actions and measures are listed that will prevent where possible or minimise odour emissions”. Residents would respectfully submit that the phrase ‘<i>where possible</i>’ is not good enough for a site in between three villages and surrounded by dwellings on all sides.</p>	

Conclusion - The Parish Council objects in the strongest terms to this application and requests that:

1. the consultation either be extended or begun again;
2. the parameters of the consultation be checked and re-assessed to include a more appropriate and wider sample of the local population;
3. the EA demonstrate to residents an understanding of the historical complaints associated with this site, including those ‘misplaced’ during paperwork transfer from the local authority;
4. a check be conducted as to whether existing planning permissions / timescales set within the appeals are expired;
5. a check of the requirements for an EIA and ERA;
6. a check of the ‘Nitrate Sensitive Zone’ status be conducted in order to establish whether this is pertinent to this application; and
7. a redrafting of almost all application documents to ensure consistent and accurate information is presented.

I would be grateful to receive confirmation that this submission has been received and accepted please.

Yours faithfully,

Mrs Lisa Stevens

[Sent electronically]

Parish Clerk,
Grimley Parish Council

²⁰ https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Odour%20Assessment.pdf
https://consult.environment-agency.gov.uk/psc/wr2-6np-jh-and-jm-hickton/supporting_documents/Odour%20Management%20Plan.pdf

Appendix 1 – Copy (screen shots) of letter received by Grimley Parish Council and all local consultees.



Date: January 2019

Ref: WP3239EK/v002

Dear Resident,

Application to vary environmental permit application ref: EPR/WP3239EK

Operator: JH & JM Hickton

Facility: Thorngrove Poultry Farm, Grimley, Worcester, WR2 6NP

On 27 September 2018 the operator of Thorngrove Poultry Farm submitted an application to us to vary an existing environmental permit. A public consultation on this permit variation will run from 10 January to 7 February 2019 as detailed below.

Existing Environmental Permit

The existing Environmental Permit reference WP3239EK permits the operator to grow up to 319,990 broiler poultry in 8 poultry sheds, however the Operator has only built 4 sheds on the site in which up to 120,000 broiler chickens can be grown at one time.

The Application to Vary existing Permit

The application to vary the existing permit seeks to add 2 double decker sheds, bringing the total amount of sheds to 6 (4 existing sheds single and 2 new double decker sheds).

The variation does not seek any additional broiler places over and above the 319,990 broilers already permitted for.

The application has stated that shed design will be in accordance with the "Best Available Techniques" document titled "How to comply with your environmental permit for intensive farming". More information in regards to best available techniques can be found here:

<http://eippcb.jrc.ec.europa.eu/reference/irpp.html>

The application also includes an additional biomass boiler to provide heating for the new sheds.

The application was duly made on the 26 November 2018 which means our permitting officers now have sufficient information to commence a full determination of the application, ie make a thorough assessment of the information provided in the application to decide whether or not we would be able to grant the variation

How to make comments on the variation

A public consultation on this application to vary the permit will go live as of the 10 January and will run until 7 February. There is more information regarding this application on the Gov.UK website at:<https://www.gov.uk/government/collections/environmental-permitting->

Environment Agency, Hafren House, Welshpool Road, Shrewsbury, SY3 8BB

[notices-of-applications-made](#) where you can search by either postcode or EPR reference as of 10 January 2019.

If you wish to make comments you can e-mail

pscpublicresponse@environment-agency.gov.uk

Or write to: P&SC - Land Team, Quadrant 2, 99 Parkway Avenue, Sheffield, S9 4WF.

Yours faithfully,

Stuart Hanks

Environment Officer

Environment Agency, 9 Wellington Crescent, Fradley Park, Lichfield, Staffs. WS13 8RR

Customer services line: 03708 506 506

Email: enquiries_westmids@environment-agency.gov.uk

www.gov.uk/environment-agency

Appendix 2

Available upon request is a list of residents that have specifically approached the Parish Council, asking that they be consulted (by the Parish Council, but also ideally by the Environment Agency) in all applications pertaining to Thorngrove Poultry Farm. These are residents that do not currently fall within the boundary indicated on the applicant's map of properties likely to be affected, but who feel that the noise, odour and particulate pollution has a measurable effect on their lives (in terms of the significant, unfair and relatively unpredictable adjustments that they have to make). The addresses of these residents have been plotted in the map below.

The spread of the addresses indicates that the effects of the poultry farm at this location are wider reaching and encompassing far more residents than previously considered.

The numbers shown are original to the map and indicate 'sensitive receptors with 400m' – ie those properties previously assumed to be the farthest extent of the effects of odour, noise etc.

Map – Extract taken from applicant's "Site Plan, current and proposed"

