



Non-Technical Summary

Environmental Statement for the erection of 5 poultry units (5040 sq. m) and biomass boiler unit; formation of attenuation pond, access track, and hardstanding; landscaping; and associated infrastructure

at

Edgeworthy Farm, Nomansland, Tiverton

April 2020

1.0 Introduction

- 1.1 The Environmental Statement has been prepared in support of a planning application for the erection of 5 poultry units and biomass boiler unit, formation of attenuation pond, access track, and hardstanding; landscaping; and associated infrastructure at Edgeworthy Farm, Nomansland Devon.
- 1.2 Previously, planning application 15/01611/MFUL for the same development was submitted and validated on the 23rd October 2015, and subsequently approved on 19th January 2016. That application was submitted with an Environmental Statement due to the scale and nature of the development when judged under the EIA Regs in place at the time.
- 1.3 Due to various circumstances the permission above lapsed without being implemented. However, the applicant wishes to undertake the development and hence this proposal is now re-submitted as previously approved for consideration by Mid Devon District Council.
- 1.4 The development is EIA development and the EIA Regulations have been updated since the previous application; the 2017 Regs are now in place and as such this submission needs to reflect the “new” Regs.
- 1.5 As almost five years has elapsed since the original statement, and its supporting surveys have been produced, it is necessary to review those surveys and if required update them to support this application. As a result the following work was undertaken
- Highways Technical Note
 - Plant Noise Assessment (which includes road traffic noise)
 - Flood Risk Assessment and Drainage Strategy
 - A review of the Ecological Appraisal work.

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- Odour Assessment

1.6 The updated Environmental Statement is framed to accord with the 2017 Regs and to ensure the District Council is in a position to assess the impacts, both individually and cumulatively, of the proposal.

1.7 Supporting Chapters provided in the Statement cover Ecology, Flood Risk and Drainage Strategy, Noise Assessment, Air Quality, Landscape and Visual Impact Assessment, Heritage, Transport, Human Health/Population, Waste, Climate Change, Cumulative Impacts.

1.8 A number of other documents are submitted in support of the application, namely a Design and Access Statement, Planning Statement and Statement of Community Engagement.

2.0 **The Site and its Setting**

2.1 The development site is located within a single grassland agricultural field to the east of Edgeworthy Farm and immediately to the south of the minor road between Nomansland and Cornermoor Cross.

2.2 The boundaries are marked with hedgerows and trees of native species, many of which are mature. The land rises west to east. The field which is the subject of this application is used for grazing livestock.

2.3 This plan shows the application site and adjoining land in the same ownership.



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3.0 The Proposal

3.1 As with the previous planning application/permission, the main part of this proposal is for the erection of 5 poultry sheds at Edgeworthy Farm. The parameters of the development has not changed; the sheds will have a pitched roof with eaves height of 2.90m and the apex height at 4.26m. External wall lighting would be fixed on the gable end of the sheds closest to the access track. All external lighting would be directed downwards and operated by motion sensors; no floodlighting is proposed.

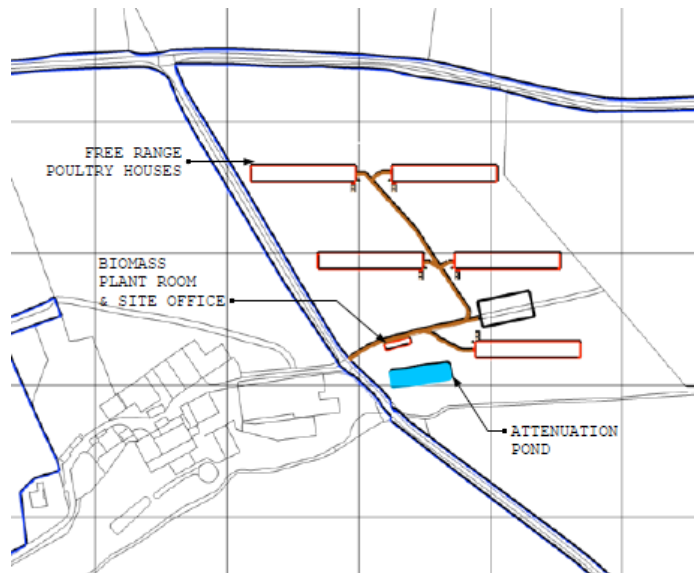
3.2 Additional structures are also proposed, as set out below:-

Structure	Quantity	Roof Design	Dimensions
Biomass Plant Room	1	Monopitch Roof	11.4m by 3.83m with roof height of 3.9m
Site office	1	Pitched Roof	6m by 3m with height of 2.5m to eaves and 2.89m to apex
Silos (feed storage)	10	N/A	Development footprint of 3.5m by 3.5m and a height of 6.67m
Temporary construction compound			50m by 40m

3.3 The layout of the proposed development area is shown in this illustration.

Proposed Operations

3.4 In terms of site operations, all sheds would be stocked at the same time with the collective capacity to accommodate up to 60,000 free range chickens (a scale of operation which under the 2017 EIA Regs indicates requires and Environmental Statement). There will be up



to six cycles per annum and it is expected that the chicks will arrive from the hatchery at Kentisbeare. The poultry sheds would operate to a 56 day cycle, based on a 46 day growing cycle with 10 days at the end of each cycle for cleanout and preparation of the houses for incoming stock.

3.5 At the start of each cycle, there will be up to two deliveries to the site for the delivery of chicks from the hatchery in Kentisbeare. These deliveries will be undertaken over two days, this will therefore generates one trip to the site per day or two vehicular movements.

3.6 Throughout each 56 day cycle there will be up to ten articulated vehicles (up to 16.5 metres long) delivering feed to the site. This will generate a maximum of two vehicular trips to site each week, or up to four vehicular movements (primarily for fed stock).

3.7 At the end of each flock cycle the buildings are cleared and the manure will be removed using bobcat type machines and transported to the existing AD plant at Menchine Farm. Following manure removal, the building will be washed out with

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high pressure power-washers and prepared for the incoming flock. The inside of the building is drained to a sealed concrete dirty water tank which will be emptied following each cleanout of the building by tanker. The contractual cleaners will use a 12 metre rigid HGV to transport their equipment onto site. This will result in a maximum of two trips and up to four vehicular movements.

4.0 Consideration of Alternatives

4.1 The Environmental Statement must consider and identify alternatives to the proposal.

4.2 The alternatives are summarised as:

- Do nothing
- Alternative site location
- Alternative site scale/area
- Alternative development in terms of design, parameters, operation etc.

4.3 **Do nothing** - The 'do nothing' option would mean leaving the development site in its current condition, and it is assumed that the current land use would remain as it is. No impacts from the development would occur. The industry is focused on developing shorter supply chains and on sourcing locally produced foods and thus contributing to local economic growth. The 'do nothing' option would not deliver safe local meat to the market and it would not provide an alternative source of income for the farmer nor would it provide opportunity to enhance local biodiversity.

4.4 **Alternative Site Location** - to avoid a proliferation of buildings into the undeveloped areas of a farm, and for operational reasons, it is an established agricultural practice to position and group together proposed agricultural buildings with existing structures at the farmstead.

4.5 **Alternative site scale/area** – The proposal is designed to be efficient and to deliver the economic benefits anticipated. A reduced scale could result in an inefficient operation; an increase could mean over-stretching. It is considered the scale is appropriate for the activity and the current farming operation's ability to

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expand. A key requirement for the development proposal (and for rearing free range chicken) is to ensure the sheds are surrounded by appropriate amount of paddocks or range (outdoor area for the birds to enjoy during the daytime). Accordingly, due to the physical land take requirements of the development proposal it located within agricultural fields to the north-east of the main farm complex. The layout of the sheds and access track have evolved during the design stage to avoid and response to on site constraint (this includes the provision of root protection area for existing oak tree etc).

- 4.6 **Alternative Development** – realistically this is not a feasible alternative; there is a demand for the chicken and farming practice needs to adapt to maximise economic viability. The UK needs to produce more food, and this proposal is part of that drive. The development proposal satisfies this requirement by seeking to develop a sustainable food chain and partnership with the 2 Sisters processing plant at Willand. This in turn will improve the public sector capacity of buying sustainable food (including a high welfare standard and reduced food miles). The Elliott Review into the Integrity and Assurance of Food Supply Networks – Final Report dated July 2014 (published September 2014) reaffirmed that current industry focus is on developing shorter supply chains and on sourcing locally produced foods. The area is heavily reliant on agriculture; this proposal will facilitate diversification.

SPECIFIC ISSUES - SUMMARISED

5.0 ECOLOGY

- 5.1 The previous Environmental Statement was supported by a Chapter on Ecology (Chapter 6). The Chapter set out the scope, methodology, the baseline conditions, the likely significant environmental effects, mitigation measures require to prevent, offset or reduce identified effects, and the likely residual effects after those measures are employed. It noted the legislative and policy framework that exists relating to ecological matters, relevant local development plan policies and the Local Biodiversity Action Plan.

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- 5.2 The Extended Phase 1 Habitat Survey identified a range of habitats on the site and its hedgerow boundaries, including that which was assessed as being suitable for a variety of notable species. There are no international or nationally designated sites either on the site or in close proximity, although there are sites within 7km (Culm Grasslands SAC). The assessment includes the relevant species, especially those listed under Section 41 of the NERC Act 2006.
- 5.3 The survey notes that considering the distances and the intervening landscape between the survey area and nearest Wildlife sites, they are outside of the zone of influence of the proposed application, which would not result in any direct habitat loss, damage or habitat degradation caused by factors such as dust deposition during construction.
- 5.4 Similarly the assessment notes that, when considering the potential impacts/level of change upon protected species during construction and operation, it was noted that the impacts should be low. The site and hedgerows had some value for a number of them (badgers, bats, amphibians, reptiles), classed as local value.
- 5.5 Four hedgerows were recorded bordering the fields with in the application site and assessed. The most common woody species were recorded. All hedgerows were classified as "Important" under the Hedgerow Regulations. Considering their species composition, respective lengths and connections to other wildlife corridors, these boundary features were considered to be of local value.
- 5.6 An assessment of likely significant effects was made. Potential impacts during the construction phase include the loss/fragmentation of habitat, degradation of habitats and disturbance to species through noise, vibration and pollution. During operation, modification of habitat through change in land use and the impacts of its use by poultry (including waste) were considered.
- 5.7 Negative impacts were identified and considered during both construction and operation. Mitigation is possible such as routing access tracks through existing

gateways; extensive planting of new native whips around the poultry sheds for screening and containment purposes and to provide shelter for the birds; management and control of waste.

- 5.8 A Construction Environmental Management Plan (CEMP) was proposed as a way to mitigate against negative impacts, outlining construction-related measures to avoid runoff, dust deposition, accidental pollution events, light spillage etc.
- 5.9 The planning system requires biodiversity net gain to be delivered and to achieve it:
- around 1000 no. new native whips would be provided, which will, with careful management, attract a variety of wildlife include bats, birds, small mammals and invertebrates and provide foraging habitat;
 - Bat and bird boxes will be installed onto mature trees at the periphery of the site to immediately boost roosting and nesting opportunities.
- 5.10 Overall, the previous Environmental Statement noted that all negative impacts can be mitigated or compensated to acceptable levels in order to reduce adverse impacts. The enhancements proposed for the site mean that there is a net gain provided.
- 5.11 The ecological survey work is now five years old and has been reviewed; the findings of the review by Orbis Ecology noted in a letter on 9th April 2019 *“I have reviewed the findings and recommendations contained in that report and resurveyed the site on 9th April 2019. An updated records search was also commissioned from the Devon Biodiversity Records Office for any new records of designated sites and protected or notable species within the surrounding 1km. As a result of this work, I can confirm that there have been no significant changes to the status of the site with regards to any sensitive ecological receptors on or near the site, and the findings and recommendations of the 2015 report are still valid”.*

- 5.12 The situation with regard to ecology remains relevant to this current application. Biodiversity net gain is embedded within the proposal.

6.0 AIR QUALITY AND ODOUR

- 6.1 The Chapter covers the air quality and odour implications of the development. Chapter 8 of the 2015 Environmental Statement provided an air quality assessment of the proposed development. In 2019 Hydrock were commissioned to undertake an Air Quality Assessment. There are two Air Quality Management Areas (AQMA), with the nearest being 13 km away in Crediton. A number of Automatic and Non-Automatic monitoring sites are in operation within the Mid Devon District area.
- 6.2 The National Planning Policy Framework requires that air quality and odour be taken into account in planning decisions. The presence of Air Quality Management Areas and Clean Air Zones should be considered. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.
- 6.3 The Methodology employed is guided by the Local Air Quality Management Technical Guidance LAQM TG (16), the Environment Agency and the IAQM and Environmental Protection UK (EPUK) Land-Use Planning & Development Control planning for Air Quality guidance.
- 6.4 It was noted that an assessment may not always be required due the scale of the development. In addition, the District Council has investigated air quality in the area as part of its responsibilities. Data available from Defra assists with considering the baseline levels and with regards to particulates exposure, background concentrations are well below their respective limits and no exceedances at nearby residential properties are anticipated.

- 6.5 Traffic emissions are a key potential contributor, and the assessment notes that the impact of these movements is not significant given a low baseline no further assessment of road traffic emissions is required.
- 6.6 The poultry unit boilers are powered by LPG and will heat the units. The total emissions rate indicates a certain approach to assessment and the technical appendix gives the relevant information. The impact is considered to be negligible.
- 6.7 Intensive farming of this type creates ammonia emissions. There are permitting regulations which require an assessment of ammonia emissions from intensive farming activities if the development is within 5km of a statutory habitat site or within 2km of a non-statutory habitat site. A non-statutory site, Morch Coppice Ancient Woodland, is 1.7km away from the development.
- 6.8 A part of a previous planning application, the Environment Agency undertook their own screening report which concluded that detailed ammonia modelling was not required.
- 6.9 Construction can result in emissions of dust to air. An assessment was carried out in accordance with IAQM guidance. Risks are determined in terms of Low, Medium and High and a matrix considers the distance of a source, its sensitivity and the magnitude of the works. The construction phase impacts are classed as medium.
- 6.10 The impacts upon the nearest main sensitive receptors (one dwelling is within 350m from the site) were considered. In terms of mitigation, whilst it is noted that overall impacts during construction are noted as low reductions in air pollution are still encouraged. Suggestions are made within the AQA, and construction dust mitigation opportunities provided.
- 6.11 The AQA concludes that:

- Impacts during construction are Low
- Impacts during operation are Negligible

ODOUR

- 6.12 Following guidance issued by the Institute for Air Quality Management (IAQM) a qualitative odour impact assessment has been undertaken for the proposed development site, which includes a complaint analysis. The latest IAQM guidance gives an overview of the varying types of odour assessment, odour assessment criteria and methods for drawing significance from predicted impacts.
- 6.13 The Environmental Permitting (England and Wales) Regulations 2010 directs that an intensive farm with more than 40,000 places for poultry requires a bespoke permit to operate in order to control the risk of pollution to air, land and water. In terms of air quality this normally takes the form of risks from odour, ammonia, nitrogen and dust. The permit requires an Odour Management Plan is required if certain circumstances exist.
- 6.14 As the nearest sensitive receptor is approximately 370 m upwind of the site, and is in a sparsely populated rural area, a qualitatively risk assessment in line with IAQM guidance is deemed appropriate.
- 6.15 In terms of methodology, a qualitative assessment has been carried out based on the source-path-receptor methodology, with guidance set out in the IAQM Guidance on the assessment of odour for planning purposes. A complaint analysis of the area has been undertaken to support this assessment.
- 6.16 There are 11 receptors locations within 1.5 km of the site, with the majority, except those in Normansland itself, having rural or light industrial activities associated with them. The site itself is in agricultural use and therefore generates activities which could create odour. There are other intensive farming activities in the area. The sensitivity of the surrounding receptors (residential) has been deemed to range from medium to high based on the exact nature of the residential unit.

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- 6.17 The proposed sheds will be the main source of odour due to bird litter and the birds themselves, with free range poultry and the attenuation pond also contributing to a lesser extent. The litter is removed to the nearby Menchine Farm AD plant. Clear-out and restock takes two days and odour is anticipated to be significantly greater during restock/clear out periods due to doors being opened and agitation of odorous litter.
- 6.18 The distance between the nearest receptors and the odour source is a minimum of 370m. The shed's ventilation is mechanised, and odour exposure will be linked to meteorological conditions, in particular wind speed and direction. The assessment considers the wind direction and frequency as part of the information to contemplate when assessing impact.
- 6.19 Intensive livestock rearing is classed as a Moderately Offensive odour. This is in the same class as other intensive farming activities within the area. No complaints had been received about existing activities at Edgeworthy Farm or nearby farms.
- 6.20 The odour source potential has been classed as medium as per H4 guidance, which as noted above classes intensive livestock rearing in the moderately offensive category. All pathways within 400m are considered as having a highly effective pathway.
- 6.21 Of the 11 receptors, 7 are recorded as having Negligible Effect, 3 Slightly Adverse Effect, and 1 (Receptor 6) having Moderately Adverse Effect. At this receptor there is some additional uncertainty due to its close proximity while being upwind of the site, where the effect could be considered as Slightly Adverse.

7.0 TRAFFIC, TRANSPORT AND ACCESS

- 7.1 The 2015 Environmental Statement considered transport and traffic implications of the application proposal. Hydrock have been commissioned to provide a Technical Note (dated 3rd June 2019). The assessment considers the existing highway and junction conditions in the vicinity of the site, noting the rural nature of the location. Personal injury accident data available was reviewed as part of the assessment.
- 7.2 The construction traffic expected to visit the site could equate to 150 deliveries for the shed building (including all construction materials and concrete for foundations) and two deliveries for the hardcore for the proposed access track, equating to a total of 152 deliveries over the four month construction phase, or an average of up to two deliveries per day.
- 7.3 Deliveries will occur in all sizes of vehicles, ranging from small rigid HGVs, to concrete delivery trucks and articulated HGVs. It is estimated that a maximum of 20 construction workers are anticipated to be on site at any one time during peak times of construction. It is therefore forecast that there could be up to around 40 two-way trips to the site associated with construction workers per day during the peak construction activities. However, this is a worst case and assumes all employees will arrive separately in cars. In reality it is considered that the numbers will be lower than this accounting for possible car sharing between employees and the possible provision of a minibus. The impact of the construction traffic on local roads is assessed to be negligible.
- 7.4 In the operational phase the poultry sheds will operate on a 56 day cycle, with seven to ten days between cycles reserved for the cleaning of the sheds. This equates to up to six cycles per year. The proposed poultry sheds will operate on an alternative cycle to those existing sheds at Menchine Farm to keep delivery traffic and potential conflict between vehicles to a minimum.
- 7.5 At the start of each cycle, there will be up to two deliveries to the site for the delivery of chicks from the hatchery in Kentisbeare. These deliveries will be undertaken over two days, this will therefore generate one trip to the site per day or two vehicular movements.

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- 7.6 Throughout each 56 day cycle there will be up to ten articulated vehicles (up to 16.5 metres long) delivering feed to the site. This will generate a maximum of two vehicular trips to site each week, or up to four vehicular movements.
- 7.7 At the end of the 56 day cycle the birds will be transported from site to the processing plant at Tiverton over two nights by articulated HGV. It is expected that nine loads will be required, generating nine trips or up to 18 two way movements over this period.
- 7.8 At the end of the cycle, cleaners will visit the site to decontaminate the poultry sheds. Over a period of two days they will use a 12 metre rigid HGV to transport their equipment onto site. This will result in a maximum of two trips and up to four vehicular movements.
- 7.9 During each cycle a visit from a vet and maintenance teams will occur. They will access the site via car or van with up to three trips per cycle.
- 7.10 A site manager will be employed separately for the propose poultry sheds. They will access the site via car and shifts are between 08:00 and 17:00. Some shifts will be night shifts that will occur when the poultry are being transported to the processing plant.
- 7.11 A Construction Traffic Management Plan (CTMP) was submitted as part of the previous planning application setting out the site access, construction vehicle routing and vehicle size / vehicle frequency. The CTMP will be implemented during the construction phase to minimise the effects of the construction phase.

Highways Technical Note

- 7.12 Hydrock have been commissioned to produce a Highways Technical Note, submitted in support of this application. It concludes that the proposed development would **not** have a materially detrimental impact upon the operation and functioning of the local highway network.
- 7.13 The Note states that level of traffic during the temporary four-month construction phase is not considered to be material and it is considered that this will not have

a detrimental impact on the safety or operation of the local or strategic highway network.

- 7.14 During operation the Note states that the cumulative impact of additional movements on the network is a 1% increase in total traffic. A 25% increase in HGV traffic will occur on the busiest days. The flows provided in the previous submission are considered to be consistent and appropriate.
- 7.15 In the context of the guidelines within paragraphs 108 & 109 of the National Planning Policy Framework it is considered that there are no residual adverse cumulative impacts in terms of highway safety or the operational capacity of the surrounding transport network and therefore **planning permission should not be withheld on transport grounds.**

8.0 Flood Risk and Drainage

8.1 Hydrock were commissioned to produce a Flood Risk Assessment and Drainage Strategy, dated 18th November 2019. This report was prepared to address the requirements of the National Planning Policy Framework (NPPF), through:

- Assessing whether the site is likely to be affected by flooding;
- Assessing whether the proposed development is appropriate in the suggested location;
- Presenting any flood risk mitigation measures necessary to ensure that the proposed development and occupants will be safe from flooding, whilst ensuring flood risk is not increased elsewhere;
- Demonstrating that the development can be adequately drained through the provision of a Drainage Strategy.

8.2 The site lies on the southern side of a gentle westward falling ridge, at an elevation of around 210m AOD in the north of the site, and 205m AOD on the southern site boundary (based on Ordnance Survey mapping). The groundwater

and surface water regimes at the site and surrounding area were also assessed in the previous Environmental Statement.

- 8.3 The site is in Flood Zone 1 and the EA's Flood Risk from Surface Water mapping shows the majority of the site to be at 'very low' risk of surface water flooding. The lowest lying/southern portion of the site is shown to be at 'low', 'medium' and 'high' risk of such flooding and has the potential risk of fluvial flooding.
- 8.4 Apart from the watercourse to the south there are no other ditches/watercourses in the site. The southern watercourse will manage the runoff.
- 8.5 There is a negligible risk of tidal flooding, low risk of surface water and groundwater flooding, and of flooding from any infrastructure.
- 8.6 Given the location, topography and flood risk, no flood resilience measures are deemed required. Safe access and egress is achievable.
- 8.7 The Drainage Strategy sets out the management of surface water runoff and to ensure the proposed development will not redirect any surface water overland flows off-site. The site is currently undeveloped and has a "natural drainage regime", where rainfall permeates the soil up to the ground infiltration capacity before flowing overland towards the southern boundary.
- 8.8 There are no sewers in the vicinity; there is however a water supply main pipe crossing the site east to west. The industry standard Source Control module in Micro Drainage has been used to calculate the existing run-off rate from the site.
- 8.9 The appropriate method of managing SUDS is considered in the report and rainfall run-off should be either reused, infiltrated to ground, discharged to a watercourse or discharged to a local sewer network (in that order of priority). It is unlikely that infiltration-based drainage will be a viable option for surface water disposal at the site. The Drainage Strategy proposes on-site attenuation combined with off-site discharge to a watercourse.
- 8.10 It is proposed that surface water be managed via private drains which flow under gravity towards a new attenuation pond to be located near the southern boundary of the site (but outside that area identified to be at potential risk of fluvial and

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surface water flooding). The approach should be acceptable to the Lead Local Flood Authority.

Foul Water

- 8.11 There is no foul drainage currently from the site, and no foul sewers in the vicinity. A separate foul drainage system is required in order to manage effluent produced during the cleaning process of the proposed poultry sheds. It is proposed that a new private foul sewer is constructed which drains flows under gravity towards a silage tank specifically designed for agricultural purposes (details are given in the report). Measures (e.g. an alarm system) will ensure that there will be no positive foul water discharge from the site to the downstream catchment.
- 8.12 The report concludes that the development is suitable in the location proposed, will have suitable resilience against all forms of flooding, will not place additional persons at risk of flooding, ensure a safe means of access/egress, will not increase flood risk elsewhere, will not result in the loss of floodplain storage or impedance of flood flows, and includes measures to ensure surface and foul water is appropriately managed. The proposal is concluded to meet the flood risk requirements of the NPPF.

9.0 NOISE

- 9.1 Hydrock were commissioned to produce a Plant Noise Assessment Report, dated 13th November 2019. A Noise Survey was carried out at the end of May/start of June 2019, and modelling work of operational plant noise associated with the proposed development was undertaken. Noise Sensitive Receptors (NSPs) were identified from which the potential impacts are assessed; the nearest is approximately 340metres away from the site. All other NSP's are screened from the site, or at a greater distance, and are less sensitive.
- 9.2 There are fans to be installed in the end of the poultry sheds, and this potential impact is considered against the existing baseline. A worst case rating at the nearest noise sensitive receptor is assessed.

- 9.3 The noise assessment notes background sound levels in the absence of chicken farm noise. A long-term environmental noise survey was carried out at one location and deemed representative of background noise at the nearest receptors. Intermittent road traffic noise from Edgeworthy Hill was audible at the measurement location, some birdsong, some wind noise (through trees). Weather information for the survey period has been taken from publicly available data logged by the weather station for Tiverton; there was no precipitation during the survey. The wind speed at the Tiverton weather station was below 5 m/s except for occasional gusts.
- 9.4 Average noise levels were recorded as between 49 and 62 DB Laeq. Typical background levels were noted as 26 dB(a) at night time and 39 dB(A) daytime.
- 9.5 The Assessment considers the noise impact of the fans to be installed and were incorporated into an acoustic sound pressure level model along with relevant structures. The manufacturer's data was acquired (provided in Appendix A of the Technical Appendix).
- 9.6 The assessment records a predicted noise rating of -15 dB during the daytime, and -2 night time. The conclusion when considered under BS4142:2014 that the impact upon the nearest sensitive receptor is therefore low.
- 9.7 As a result of the assessment work undertaken the noise impact of the development is predicted to be low. The Report notes that given the work undertaken noise does not need to be considered in determining the planning application.

10.0 HUMAN HEALTH/POPULATION

- 10.1 Along with the National Planning Policy Framework (as revised) and the development plan, the Localism Act 2011 and The Health and Social Care 2012 provide a relevant basis for considering the impact upon human health/the population.

- 10.2 Pollution (air, noise, dust, water environment, from site-related traffic), and transport movements are the potential causes of impacts. They are however unlikely to have an impact upon human health due to the locality, topography and sparsity of development. The area is rural and agricultural activities are common; the local population is used to such activities taking place and are aware of the potential of slow moving vehicles.
- 10.4 In terms of pollution, management practices both during construction and operation will deal with this (issues which are formally regulated). Many potential issues are dealt with in detail in the Statement.
- 10.5 The construction phase and post-construction/operational phase have different potential impacts. In both scenarios, the impacts assessed as part of the Statement are considered to be low.

11.0 CULTURAL HERITAGE

- 11.1 A heritage desk based assessment was conducted by Cotswold Archaeology and supported application 15/01611/MOUT. It is considered that nothing of any significance has changed since that time and it is therefore submitted in support of this current application.
- 11.2 A desk-based assessment was undertaken, its scope covering the pertinent assets. The methodology employed during this assessment was based on key professional guidance, including the 'Standard and Guidance for Historic Environment Desk-Based Assessment' (Chartered Institute for Archaeologists 2014); and English Heritage's (now Historic England) 'Conservation Principles' (2008). Appropriate sources were used for the assessment, both national and locally available. A site visit was also conducted to assess the land, the surrounding environs and the visible cultural heritage.
- 11.3 The assessment considered the significance of the heritage assets on the site/in the area. There was no current evidence to suggest that the Site itself formed a focal point for prehistoric activity, although the potential for encountering remains of that period should not be discounted. The Site is likely to have been in agricultural use since at least the post-medieval period, and therefore retains

some potential for associated features to survive below ground. If present, it is anticipated that these would be of limited archaeological interest.

- 11.4 There is no listed building on the site; the nearest is the Grade 2 Listed Higher Edgeworthy to the south by approximately 380 metres. There are assets of archaeological interest to the north in the shape of barrows some distance to the north.
- 11.5 Whilst Heritage England had some minor concern about the setting of the barrows, a further statement (provided as part of this application) was submitted in response. These assets haven't changed since the consideration of the previous approval and as this application is identical the response from a heritage aspect should therefore be the same.
- 11.9 The impact upon the nearest Listed Building's setting is considered to be limited; the site is seen in the context of the existing farm to the immediate west, where there is already a range of buildings that sit within the landscape.
- 11.10 The impact upon cultural heritage is therefore sufficiently small to allow for consent to be granted.

12.0 CLIMATE CHANGE

- 12.1 Agriculture and climate change are entwined and the impacts of climate change upon food production is increasingly well documented. The impact of the climate upon the soil, water, ability to grow crops, changes in temperature, more extreme weather etc all affect the ability of the world to produce sufficient food to sustain its growing population. Food is a basic human need and whilst an increasingly globalised system of food production and transportation is in place.
- 12.2 The planning system has an inherent function to ensure that developments are sustainable and take into account climate change; the 2017 Regs include the requirement to refer to climate change, many Councils have called a Climate Emergency, and development plan policies are increasingly cognisant of the issue.

- 12.3 The development constitutes additional agricultural live food production in the United Kingdom to meet demand in the country. This therefore reduces the need to import produce, which reduces the carbon footprint of the food production process, and contributes towards increased food security for the nation.
- 12.4 The business will have to adapt to the challenges of climate change. Agriculture is aware of the risks climate change poses to its operation, as well as the impact of its own activities (pollution, emissions, etc), and the potential impact it has on all resources, markets and viability. All these have the potential to increase risk and volatility to the business and the operator will work to ensure it continues to meet the needs of its customers whilst adapting where possible to limit the impacts of climate change.
- 12.5 Greener approaches to business continue to emerge as a reaction to the growing understanding of the impacts of climate change and agricultural practices will respond accordingly. It is possible that regulation will change, enforcing a change in practice. Agricultural operations will inevitably modernise in response to its context, and this change will include how this proposed development will evolve.

13.0 WASTE

- 13.1 Waste from an operation such as this is an issue that needs addressing due to potential harmful impacts. The estimated tonnage of waste produced per cycle is 24 tonnes per shed, a significant amount as this equates to 120 tonnes per cycle. The vehicles used for transporting waste have the capacity of 14 tonnes per load, meaning around 9 movements at the end of each cycle. The waste is transported to the AD plant at Menchine Farm, in close proximity to the west of the application site.
- 13.2 This level of traffic movements are not considered to be excessive and will not contribute towards a negative impact on highway safety. Environmental Permitting of the operation requires suitably high standards of management to be maintained and the manner in which waste is treated is part of that. The proposed development, subject to suitable ongoing management that is regulated, will not have a significantly harmful effect.

- 13.3 It is important that waste is managed appropriately due to the potential impacts. This application is identical to the previous approval, and the fact that there is a local solution to managing poultry litter is positive. The site will be subjected to monitoring to ensure that wider impacts are controlled.

14.0 LANDSCAPE/VISUAL IMPACT ASSESSMENT

- 14.1 The likely visual and landscape effects of the Proposed Development are assessed, including impacts upon local visual amenity. The assessment was undertaken by a Chartered Landscape Architect, with regard to best practice. Particularly the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition (2013), the industry standard, as published by IEMA and the Landscape Institute.
- 14.2 As the proposal includes extensive tree and shrub planting as an integral part of the design, no further landscape and visual mitigation measures were considered necessary. This remains the case with this current submission.
- 14.3 The site will be seen within the agricultural context within which it sits. The strong field boundary vegetation that surrounds the Application Site and is common throughout the local area, and the frequent woodland blocks and tree belts, combined with the proposed extensive tree and shrub planting around and within the site area, mean that the proposed development has been assessed as not having any significant effects on landscape character, landscape features and elements.
- 14.5 It is considered that the view submitted with the previous application is consistent at the current time: the development proposal could be accommodated on the application site without unacceptable effects on local landscape character or landscape features and elements, or on the visual amenity experienced within the local area.

15.0 CONSIDERATION OF IMPACTS

- 15.1 A comprehensive table is provided in the full Statement which considers impacts both during construction and operation, and assesses what mitigation, and its impact, can have on the development. The result of this assessment is that the

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development can be accommodated at this site without significant detriment to the assets noted.

16.0 CUMULATIVE IMPACT OF THE DEVELOPMENT IN COMBINATION WITH OTHERS

- 16.1 A review of existing developments that could have a significant “in combination” environmental impact has taken place. To qualify as eligible, developments need to have a tangible impact upon the locality, defined in this instance as a 5km radius of the site. Noise, transport, flood risk/drainage and ecology are the main features that could have a cumulative impact to consider.
- 16.2 The rurality of the site means that the more significant developments in the locality are agricultural-based. The locality is not a location where other significant development will be take place, the countryside being an area where development is strictly controlled under the planning regime. The AD plant at Menchine Farm is one operation which generates vehicular movements to the local road network, and this proposed development will also do so. With road miles comes a number of impacts and these need due consideration. It is fortunate that the proximity of Menchine Farm means road miles are minimized when it comes to waste product being transported. There is also an arrangement to coordinate transport when the impact of vehicular movements is minimized.
- 16.3 The topography of the local landscape and its rurality means that in-combination effects from other significant developments is negligible to non-existent.

17.0 CONCLUSION

- 14.1 This Statement is submitted in support of the application that is identical to that granted consent in 2016. Many aspects are consistent and resubmitted for consideration. Updated survey/reports have been submitted relating to Noise, Traffic/Transport, Flood Risk Assessment and Drainage Strategy.

- 14.2 A review of the Ecological Survey by a qualified Ecologist concluded that the situation remained the same and that no further work was required.
- 14.3 The impacts of the proposal have been considered and it is concluded that, along with the development plan, little has changed. It is respectfully submitted therefore that planning permission should therefore be granted for this proposal to diversify an agricultural operation in this rural area of Mid Devon where farming is an integral part of the fabric of the landscape, economy and society.
- 14.4 Whilst there is an emerging revision to the adopted Local Plan, a process which is well advanced (main modifications consultation has recently taken place) the policies have not yet been formally adopted. The current Local Plan was in place when the previous application was approved and remains the development plan for the purposes of being the primary consideration when determining this application.
- 14.5 It is submitted that the development remains acceptable in planning terms and that planning permission should be granted.

March 2020