

The Arustu Family
Thorington Hall Thorington Saxmundham Suffolk
IP17 3QZ

24 April 2008

Mr P J Ridley
Head of Planning Services
Suffolk Coastal District Council
Melton Hall
Woodbridge
Suffolk
IP12 1AU

Dear Mr Ridley

I am writing to voice my family's objections and concerns regarding the planning application No C/08/0652 at Thorington Gravel Pit.

As the nearest neighbour, this unit to a very high degree shall adversely affect us. First we would like to point out that it is considered inappropriate for this type of highly intensive poultry unit to be sited within 400m distance of neighbouring properties. In the applicants report they state our property is 350m away. Thorington Lodge has recently been sold and the new owner is preparing to renovate the property. This is well under 400m away and will be made totally uninhabitable by this poultry unit through the extremely close proximity. Both properties will be severely affected by the odour levels, vermin and dust pollution and potential health hazards.

The applicants report claims that the site is not overlooked by any domestic property. Unfortunately the site is highly visible from the ground floor of Thorington Hall. What are beautiful views at present will be completely destroyed by this development. The only thorough screening of the site is from the road (A12) aspect. It is unlikely that it would cause any distress to motorists on such a busy road but it will cause considerable distress to us, as it is the main view from our family home.

Having visited the Suffolk Coastal District Council website planning pages, I find it deeply worrying that we are the only neighbours to have been consulted by the council. Several properties within the parish have their drinking water supplied by borehole wells. Have you contacted all the parish residents? If not I

would urge you to do so, as despite whatever preventions are set in place, if this application is permitted there is a worrying risk of contamination to drinking water.

From a personal perspective we are greatly concerned about the possible health and pollution implications of such an immense and intensively run unit. There is research to back up the claims that the elderly and sick are at a much higher risk of disease and health complications. I would like to point out that my mother, who has a chronic heart complaint and diabetes, has after several months in hospital returned home. She is going to be particularly vulnerable to further health complications from this unit's pollution of the area, any possible disease outbreaks and infections carried by vermin.

Having read through the application documentation I would like to bring to your attention a number of points I feel need further consideration and investigation.

Biodiversity and the Environmental Impact

There are several species of flora and fauna, which are protected or considered rare, which inhabit Thorington Gravel pit and the surrounding areas including European Protected Species (Great Crested Newt), those that are protected under the Wildlife and Countryside Act (Grass Snake) and UK Protected Species (Pipistrelle Bat). These examples are not exclusive and further investigation needs to be carried out to identify all species that fall into these categories.

Protection of wild animals of European protected species

39. — (1) It is an offence-

(a) deliberately to capture or kill a wild animal of a European protected species;

(b) deliberately to disturb any such animal;

(c) deliberately to take or destroy the eggs of such an animal; or

(d) to damage or destroy a breeding site or resting place of such an animal.

1

The new DEFRA extension of protection to the Habitats Regulations, August 2007 states that **it will no longer be a defense to show that the killing, capture or disturbance of such species or the destruction or damage of their breeding**

¹PART III, PROTECTION OF SPECIES

Protection of animals Statutory Instrument 1994 No. 2716, The Conservation (Natural Habitats, &c.) Regulations 1994, © Crown copyright 1994. Taken from <http://www.opsi.gov.uk/>

sites or resting places was the incidental and unavoidable result of a lawful activity.

Something I find significant but worrying is the fact that the Environment Agency although contacted never appear to have responded and that no one has followed this up, giving a bias, whether intentional or not, towards the application.

Environmental damage from nitrates; potential for increased carbon emissions; air pollution and odour levels

The applicant has contradicted themselves more than once in their report.

- *“Most of the litter will be moved off site for use as fuel in specialist electricity generating plant. A written agreement is in place”*
- *“At the clean-out, dirty water is directed to underground tanks for storage. It is then spread onto land, under the control of a separate farming business.”²*
- *“There is no storage of used litter outside the houses **at any time.**”³*

This is contradicted in the Introduction of the report and the Odour Management Plan.

- *“Removal of manure. Manure production is estimated at 750 tonnes per annum...If the power station were not accepting waste alternative routes may be explored for spreading the litter to land as fertilizer.”⁴*
- **“Areas Where Difficulty Obtaining Information**
*The written agreements from the dirty water removal contractor and litter fired power station **have yet to be obtained** and will be supplied as soon as they become available.”⁵*
- *“Litter is carefully placed into trailers positioned at the entrance to each house. When full the trailer is covered.”⁶*

It is quite clear that they feel happy to put forward a report that is erroneous. Both the management of manure and dirty water are potentially the most significant areas of concern for the parish as a whole on several points.

1. Contamination of the water table supplying residents' borehole wells from potential leakage of underground storage tanks. As these storage tanks are underground, surely it will be more difficult to detect any damage/deterioration?

² pp. 2-3 of Odour Management Plan.

³ P. 2 Odour Management Plan

⁴ p. 9 of the Introduction of the main report

⁵ p. 11 of the Introduction of the main report

⁶ p. 2 Odour Management Plan

2. If the unknown power station does not accept the manure and it is spread on the land there is a high likelihood of nutrient seepage in to the water table.
3. Pollution by high levels of nitrates in the production of overcrowded factory farmed animals: through their manure; potential seepage from the storage of carcasses (it is very unclear in the applicants report exactly how often the carcass containers will be removed); the variety of illnesses that occur in intensely farmed animals and biohazards related to this. So damaging to the environment is the potential of eutrophication, the EU has introduced legal limits on the amount of nitrogen a farm can produce per hectare.
4. If the unknown power station *does* take the manure, will it be incinerated? If yes, will this not produce a significant amount of carbon emissions from such a large and intensive factory farm?
5. There seem to be rather vague answers to exactly what times feed will be delivered, buildings will be cleaned out, waste material removed and of the times of the day/night and days of the week birds will be caught, collected or harvested.

Vermin and associated health implications

Even with the highest precautionary levels it cannot be argued that such a vast and intensive production unit will not encourage an increase in both flies and rats. This is going to be of serious concern to all neighbouring domestic properties for some large distance. Poultry carry mites and there is going to be an increase in levels of allergens through these mites and through the dust created from these units. Certain people, my mother included, have severe allergic reactions to poultry mites.

Avian flu

The threat of avian flu and its possible transference to humans through zoonosis is heightened by the proposed size and intensity of this broiler unit. The recent outbreak at the Bernard Matthews farm in Holton had less than half the quantity of birds. Factory farmed poultry may seem on the surface to be more secluded and protected than the wild bird population, but in such intensive situations it only takes one bird to become infected to have an epidemic of biblical proportions. Do we really want to create the conditions for a potential outbreak of avian flu in our area, and worse still, a possible cross species leap, which *has* already caused the death of 376 people, as of 2 April 2008. *“Concerns remain that the virus might develop (the ability to pass easily from person to person), or that it might mix with human flu viruses to create a new virus. It is this ability of avian flu to change and mix that has given rise to the fear of a new human flu pandemic.”*⁷

⁷ “Bird Flu & Pandemic Influenza: What are the Risks?”, Department of Health website, <http://www.dh.gov.uk>

Reduced public acceptance of intensively produced poultry

With all the recent health scares and outbreaks of avian flu and the increased public awareness of the welfare of intensively farmed poultry, I am at a loss to see how the council would wish to be seen condoning practices that are widely perceived as unethical by the general public. Supermarkets, the largest customers for factory-farmed poultry, cannot keep up with the demand for free range poultry. It doesn't seem logical to add to a decreasing market need.

There appear to be conflicting opinions on the quality of the land in question. In the letter from Suffolk County Council dated 25 October 2007 it states *"The land was formerly within the Best and Most Versatile agricultural category prior to mineral extraction and the exercise of the aftercare was successful in returning the land back to near its former potential when aftercare was concluded now over 5yrs ago. I would advise that DEFRA be consulted regarding the effect of the proposals on the agricultural practice of the holding as a whole, and the **implications of loss of land of the Best and Most versatile quality.**"* Has DEFRA been consulted?

This planning application is wholly inappropriate for the area. To try to claim it will not impact on the areas environment and the residents' standard of living is misguided at the every least. The suggestion that his will help the local economy is questionable with less than a handful of jobs to be created. I cannot strongly enough voice my concerns for the negative impact of this planning application and would urge you to oppose it thoroughly. We will not sit quietly on this matter and the general feelings of parish residents we have been able to contact to date would suggest there is going to be a unified resistance to the project, however far we have to take this.

Yours sincerely,

Jasmin Arustu on behalf of Dr F.H. & Mrs I.S. Arustu