

FORMAL OBJECTION TO PLANNING APPLICATION

Weston Parish Council

Development Management
South Holland District Council

Dear Planning Officer

Re: Planning Application – H22-0566-26

Proposed Free Range Egg Production Unit, Delgate Bank, Weston

Weston Parish Council objects in the strongest possible terms to this planning application and respectfully requests that planning permission is refused.

The Council considers that the application fails to satisfy the requirements of the National Planning Policy Framework (NPPF) and the South East Lincolnshire Local Plan because the applicant has failed to demonstrate, through clear, consistent and robust evidence, that the development can be undertaken without causing unacceptable impacts upon highway safety, drainage infrastructure, water quality, landscape character, biodiversity and the wider rural environment.

The application is characterised by a complete failure to consult, missing information, contradictory statements, unsupported assumptions and technical omissions. These deficiencies are fundamental and prevent both the Local Planning Authority and statutory consultees from properly assessing the proposal.

The proposed development falls below the threshold requiring an Environmental Permit under the Environmental Permitting (England and Wales) Regulations 2016.

Consequently, many of the environmental assessments that would ordinarily accompany a larger poultry installation, including detailed consideration of Best Available Techniques, nutrient management, pollution prevention and environmental management systems, have not been subject to the same level of independent regulatory scrutiny. Given the site's proximity to two principal drainage watercourses and the scale of the proposed operation, the Parish Council considers that the Local Planning Authority should nevertheless require equivalent supporting information to demonstrate that the development can operate without unacceptable environmental impacts.

1. The Application is Incomplete and Should Be Refused

The burden rests with the applicant to demonstrate that planning permission should be granted.

In this case, the applicant has failed to provide sufficient information to enable the Local Planning Authority to conclude that the proposal represents sustainable development.

The Council considers that the following essential information is absent:

- Range Management Plan
- Nutrient Management Plan
- Manure Management Plan
- Carcass (Dead Bird) Management Plan
- Water Quality Protection Plan
- Pollution Prevention Plan
- Biosecurity Management Plan
- Odour Management Plan
- Fly and Vermin Management Plan
- Waste Management Plan
- Emergency Pollution Response Plan
- Disease Management Plan
- Future Expansion Statement
- Operational Environmental Management Plan

Without these documents the application cannot demonstrate that the proposed operation can function safely or sustainably.

2. Premature Determination and Outstanding Statutory Consultation

The Parish Council is extremely concerned that the application is progressing whilst key statutory consultation responses remain outstanding.

The proposal directly affects:

- Delgate Drain;

- Moulton Mere Drain;
- the wider Internal Drainage Board network;
- flood risk infrastructure;
- water quality.

The Council understands that responses from the Environment Agency and the Internal Drainage Board have not yet been fully considered.

These organisations possess the technical expertise necessary to assess:

- pollution risks;
- drainage impacts;
- flood resilience;
- water quality;
- maintenance access.

Until those responses have been received and fully considered, the Local Planning Authority cannot reasonably conclude that the proposal is acceptable.

3. Internal Drainage Board Governance

The Parish Council notes that the Chair of the relevant Internal Drainage Board is also closely associated with the application.

The Council makes no allegation whatsoever of impropriety.

However, because the Internal Drainage Board is a statutory consultee for this application, it is essential that any consultation response clearly demonstrates that appropriate governance procedures have been followed and that any actual or perceived conflicts of interest have been appropriately managed in order to maintain public confidence in the planning process.

4. Failure to Demonstrate Compliance with Drainage Legislation

The application does not demonstrate whether separate statutory approvals are required under the Land Drainage Act 1991 or the Internal Drainage Board Byelaws.

The application fails to identify:

- whether any development falls within the Internal Drainage Board maintenance margin;

- whether works require Land Drainage Consent;
- whether drainage outfalls require approval;
- whether maintenance access to the drainage channels will be restricted;
- whether the proposed drainage strategy has been accepted by the Internal Drainage Board.

The Parish Council considers that planning permission should not be granted where the applicant has failed to demonstrate that these statutory requirements can be satisfied.

5. Water Quality

This represents one of the most serious deficiencies within the application.

The proposed ranging area extends directly adjacent to Delgate Drain and Moulton Mere Drain.

Despite this, the application provides no satisfactory explanation of:

- buffer strips adjacent to the drains;
- nutrient loading;
- manure deposition;
- runoff interception;
- pollution monitoring;
- emergency pollution procedures;
- protection of aquatic habitats.

The Flood Risk Assessment considers flood conveyance but gives very limited consideration to protecting water quality.

The Council therefore considers that the applicant has failed to demonstrate that the proposal would protect the water environment.

6. Highway Safety

The Transport Statement contains significant deficiencies.

Collision Data

The collision assessment appears incomplete.

Known police-attended accidents are omitted, including:

- Delgate Crossroads – 27 October 2024 (three vehicles);
- Austendyke Road – 14 December 2024 (two vehicles).

If the collision dataset is incomplete, the conclusions regarding highway safety are unreliable nor do they reflect the roads identified as the main route i.e. Moulton Chapel Rd and Fengate Drove/Delgate Bank and Westgate. This route is marked at the Fengate Drove entrance as Unsuitable for HGV's.

Road Width

Delgate Bank is approximately 3.2 metres wide in places and functions as a single-track road not 3.7 metres as stated in the application. It is adjacent to the Delgate Drain with no identified passing places.

The Transport Statement does not adequately assess:

- opposing HGV movements;
- agricultural machinery;
- reversing distances;
- passing opportunities;
- restrictions caused by Delgate Drain and mature hedgerows.

HGV Routing

The application assumes routing that appears unrealistic.

The Transport Statement appears to assume that HGV traffic will approach the site via Moulton Chapel Road. However, no enforceable routing agreement, planning condition or legal mechanism has been proposed to require drivers to use this route. In practice, vehicles are likely to use the shorter and more direct route via Austendyke Road and Delgate Crossroads. The highway assessment should therefore assess the impacts of

the most likely operational route rather than an assumed preferred route that cannot be guaranteed and recognise that these routes have all been deemed unsuitable for HGV.

Operational Traffic

The predicted vehicle movements appear inconsistent with a commercial poultry enterprise housing 32,000 birds.

The assessment appears to underestimate or omit movements associated with:

- feed deliveries;
- egg collections;
- carcass collections;
- manure removal;
- veterinary visits;
- maintenance contractors;
- consumable deliveries;
- emergency attendance.

Based on typical industry practice, the enterprise would be expected to generate regular egg collections, feed deliveries, licensed animal by-product collections, manure removal and other servicing activities. The application does not explain how these activities have been accounted for within the Transport Statement, nor does it provide a detailed operational logistics assessment. Consequently, the Council is not satisfied that the traffic assessment accurately reflects the likely operational demands of the proposed development

A typical 32000 bird unit will produce around 28,000 eggs per day or 65- 75 pallets per week. These are collected every other day or a minimum of 3 times per week.

Laying hens consume 110- 120g feed per day, for 32,000 birds that equates to 3.5 tonnes per day with the average bulk lorry carrying 28 tonnes that would be 4 – 5 deliveries per month.

Typical frequency of dead birds for this size of unit would equate to 2 – 4 collections per month.

Manure removal would equate to 3 collections per month.

HGV movements alone would be between 5 – 7 per week.

7. Operational Management

The application provides insufficient information regarding the day-to-day operation of the site.

No detailed information is provided regarding:

Poultry Mortalities

- storage of dead birds;
- refrigerated containment;
- collection arrangements;
- biosecurity;
- odour management.

Given a flock of 32,000 birds, routine mortalities are inevitable. The application does not explain how compliance with animal by-product legislation will be achieved.

Manure

No Manure Management Plan has been submitted.

There is no explanation of:

- manure storage;
- removal frequency;
- transport;
- loading areas;
- pollution prevention.

Waste

No detailed arrangements are provided for:

- veterinary waste;
- wash water;
- chemicals;
- disinfectants;
- waste feed;
- packaging.

Biosecurity

The application also fails to explain:

- wheel washing;
- vehicle disinfection;
- visitor management;
- disease prevention;
- protection from wild birds.

8. Free Range Management

The Range Area Plan identifies the extent of the range but fails to explain how it will function.

No information is provided regarding:

- fencing;
- bird containment;
- rotational grazing;
- protection of drainage channels;
- shelter;
- predator management;
- vegetation management.

These omissions are particularly significant given the proximity of the range to major watercourses and housing.

9. Landscape Impact

The proposed building measures approximately 110.5 metres long, 24.5 metres wide and approximately 8.8 metres high to the ridge, creating a building of almost **2,700m²**.

The Landscape and Visual Appraisal concludes that impacts will be minor.

The Parish Council considers that conclusion to be unsupported.

The building:

- occupies an isolated position within an open Fenland landscape;

- will be visible over considerable distances;
- is substantially larger than surrounding agricultural buildings;
- relies upon landscaping that will take many years to become effective;
- sits alongside existing and proposed electricity transmission infrastructure.

The cumulative landscape impact has therefore been underestimated.

10. Site Selection

The justification for selecting this field is inconsistent.

The application suggests that electricity infrastructure influenced the site selection.

However:

- overhead power lines already cross the site;
- the Meridian transmission route is proposed close to the eastern boundary;
- no comparative assessment has been provided demonstrating why sites adjacent to the existing farmstead were rejected.

The applicant has therefore failed to justify this location.

11. Future Expansion

The poultry house occupies only part of the available site.

The application provides no confirmation that:

- this represents the full intended development;
- additional poultry houses will not follow;
- bird numbers will not increase;
- the infrastructure has not been designed to accommodate future expansion.

The absence of this information prevents proper assessment of cumulative impacts and raises legitimate concerns about incremental intensification.

12. Contradictions and Inaccuracies

The Parish Council is concerned that the application contains a number of inconsistencies and unsupported assertions, including:

- omission of known highway collisions from the Transport Statement;
- assumptions regarding HGV routing that are not supported by enforceable measures;
- limited assessment of water quality despite the proximity of principal drains;
- limited operational information for a commercial poultry enterprise;
- insufficient justification for site selection;
- landscape conclusions that do not adequately reflect the scale, height and prominence of the building.

Taken together, these deficiencies undermine confidence in the reliability of the submitted evidence.

The Parish Council considers that the applicant has failed to demonstrate that the proposal complies with the requirements of sustainable development or that it can operate without causing unacceptable impacts on the surrounding environment.

This is not simply a matter of additional information being secured by condition. The omissions identified go to the heart of the application and prevent the Local Planning Authority from properly assessing its environmental, operational and cumulative effects.

The application does not contain the operational environmental management information that would normally be expected for a commercial free-range poultry enterprise of this scale. As a result, the Local Planning Authority has not been provided with sufficient evidence to conclude that the development can operate in a manner that protects water quality, the surrounding environment and public amenity.

Planning permission should not rely upon assumptions regarding future management where those arrangements have not been secured through the application. Accordingly, Weston Parish Council respectfully requests that **South Holland District Council refuses planning permission.**

Should the Local Planning Authority nevertheless be minded to approve the application, the Parish Council requests that it is first referred to the Planning Committee for determination and that all outstanding statutory consultee responses and the missing

technical information are obtained and made available for public scrutiny before any decision is reached.

Yours faithfully,

Clerk to Weston Parish Council

On behalf of Weston Parish Council