



Ymgyrch Diogelu Cymru Wledig

Campaign for the Protection of Rural Wales

Clwyd Branch (Denbighshire CC, Flintshire CC, Wrexham CBC areas)

Comments to –

**Cygnor Bwrdeistref Siriol Wrecsam
Wrexham County Borough Council**

Planning Reference Number : P/2021/0077

Proposal : Erection Of An Organic Free Range Egg Production Unit And All Associated Works

Location : Cae Mor Farm, Llwyn Mawr, Pontfadog, Llangollen, LL20 7BE

The Campaign for the Protection of Rural Wales (CPRW) have been contacted by concerned residents local to this application site, requesting assistance. The proposals, potential visual impacts and the Planning Application were discussed at the January 2021 and recent March 2021 online Branch bi-monthly meetings, and via email.

CPRW comment on their priorities, review of this application, and support these residents.

CPRW is a charity registered in England and Wales. Charity number: 239899
Registered office: Ty Gwyn, 31 High Street, Welshpool, Powys, SY21 7YD

<https://cprw.org.uk>

The Campaign for the Protection of Rural Wales - CPRW established in 1928, is one of Wales' foremost countryside charities. Through its work as a landscape and environmental watchdog it aims to secure the protection and improvement of the rural landscape, environment and the well being of those living in these areas.

CPRW and Clwyd Branch appreciates the importance of the farm sector in managing the countryside and maintaining vibrant rural communities. However, is concerned about farm

developments which could have an adverse impact on the rural landscape, particularly in respect of the siting and appearance of farm buildings, access tracks and removal of hedgerows. CPRW also has significant concern about the expansion of intensive poultry units in Wales, contributing to ammonia emissions, nitrate and phosphate pollution, effect on rivers and on flora and fauna.

The concerns of residents are expressed in their information and detailed concerns below, regarding the damage this development would have, on :

- the visual aspect of this special landscape area
- the pollution caused by ammonia and nitrates
- the damage to the flora and fauna, not only those on the site and range, but the surrounding area.

Visual Aspect

In the Landscape and Visual Assessment Document 4767656 of the Planning Application, extracts from Welsh Government (WG) and Natural Resources Wales (NRW) LandMap, show that the Ceiriog Valley in which the proposed development is situated, has a -

High quality of the landscape, the result of the sense of peace and tranquillity as well as the scenery.

Scattered stone-built farms reached by steep winding lane.

And is "sensitive to any changes which might affect its rural character and tranquillity....it is also sensitive to changes which might take place on the surrounding uplands.

This is where the free range egg laying unit is to be built. This does not appear to coincide with Wrexham's aim to *retain its existing distinctive rural character, avoid visually intrusive development which is not in keeping with the area and ensure new buildings and conversions of older buildings are sympathetic to local character, using local materials where possible ie local stone.*

The photographs taken to show the impact that the development would have on the local population and residents seems to have been rather selective and do not show the full affect on the surrounding area.

Pollution from Ammonia & Nitrates

This will occur due to the excretions of the chickens, both within the housing and outside on the range. The "small" stream mentioned in the Ecological report runs down into the Ceiriog River which then feeds into the Dee. This development is within the Dee Water Protection Zone, a Drinking Water Catchment Area.

It is stated that the nearest watercourse is approximately 140 metres from the site. This figure is in both the response from Welsh Water, and the Ecological Report. What is unclear

is the definition of site, and whether it just the buildings or whether it includes the range, and how was the distance was calculated.

This site is for a 24,000 egg laying unit, but there is a 16,000 egg laying unit nearby which obviously needs to be taken into account when calculating the amount of ammonia which will be emitted.

It is noted that currently NRW and Coed Cadw Woodland Trust share our concerns about the levels of ammonia coming from this site. The reason for their concerns is the evidence from the NRW Powys Pilot Study¹. This research revealed that:

The preliminary investigation showed that the smaller, non-regulated, but covered under planning, poultry units have a greater impact on the local ammonia concentrations than the much larger regulated intensive units. The fact that 12,000 free range laying hens have a greater environmental impact than 80,000 meat birds (housed in two buildings) seems counter intuitive and may be hard to understand by planners and members of the public. This study clearly demonstrates that if clusters of farm units are grouped close to sensitive conservation sites their impacts could cause significant damage. Therefore, careful consideration through the planning process needs to be given to the location of further livestock unit developments in any area, alone and cumulatively.

This would not only cause damage to listed sensitive sites but the farmland surrounding the development. NRW have asked for further information and it is hoped that we can view this information and make further comments when it is available.

Flora and Fauna

A Preliminary ecological appraisal was carried out on 30/08/20, but this was only a 1 day appraisal to try and determine whether any protected species were likely to inhabit the site.

In this report the Mitigation for breeding birds is:

A thorough ground inspection of the site should be completed prior to works commencing on site if works start between 1st March and 31st August (inclusive) in any given year. If breeding birds are found, an exclusion zone of 5 metres should be implemented and maintained until breeding is complete and the fledglings have left the nest.

According to CIEM Guidelines² there has to be a full report for planning is required. Surely this should be done before the planning permission is granted, similarly a planting plan should also be considered before consent is given.

1 An assessment of cumulative atmospheric releases evidence report 218. Khalid V Aazem and Simon A Bareham

2 CIEM Guidelines Preliminary Ecological Appraisal Second Addition 2017

Conclusion : CPRW Clwyd Branch **object** to this application and support the local residents in their detailed objections.