



HABITAT REGULATION ASSESSMENT JUSTIFICATION

DEVELOPMENT: Proposed Organic Free-Range Egg Production Unit

LOCATION: Cae Mor Farm
Llwyn Mawr
Pontfadog
Llangollen
LL20 7BE

CLIENT: E & J Morris

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This statement is prepared in consideration of the Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) and the Natural Resource Wales Guidance as detailed below;

Natural Resources Wales advice to planning authorities for planning applications affecting phosphorus sensitive river Special Areas of Conservation (SACs)

How do I know if a proposal might increase phosphorus levels within the SAC?

Every development should be considered on a case by case basis. Developments should first be screened to determine whether they are likely to have a significant effect. The screening process should apply to developments within river SAC water body catchments and non-SAC tributaries flowing into them.

The following developments can be screened out as not likely to have a significant effect on a river SAC in relation to phosphorus inputs as there is unlikely to be a source of additional phosphorus or pathway for impacts:

- Any development that does not increase the volume of foul wastewater;

The proposals at Cae Mor will not increase the volume of foul wastewater as the staff are already working on the farm at Cae Mor. Dirty water will be generated from the cleaning out of the poultry unit, it will not be applied to the farm land at Cae Mor, it will be collected by Gamber Logistics Ltd as detailed in the Manure Management Plan.

In assessing the Phosphate levels produced on farm a calculator has been used based on one room in the unit. Staffing of the unit would be 2 people considered to be the same as the occupancy of a one bedroom house.

	A	B	C	D	E	F	G	H	I	J	K
1	Daily discharge calculator for domestic properties										V2.0 July 2019
2											
3	Use this calculator to work out how much effluent your septic tank or small sewage treatment plant will discharge a day when it's										
4	being used to treat the sewage from one or more houses or flats.										
5											
6	Number of properties		1	→	Enter the number of properties which are connected to the plant						
7											
8	Number of Rooms		1	→	Enter the total number of bedrooms for all of the properties and press return						
11											
12	Cubic metres a day		0.75	→	This is how much treated sewage your plant will discharge a day						
13											
14											
15	For example, if you have 2 houses sharing a septic tank, one with 3 bedrooms and the other with 4, enter 2 for the number of properties,										
16	7 for the number of bedrooms, and this will give you a result of 1.65 cubic metres a day.										

- Any development that improves existing water quality discharges by reducing the phosphorus load of wastewater, or by decreasing the volume of wastewater produced (e.g. by improvements to existing wastewater treatment infrastructure);

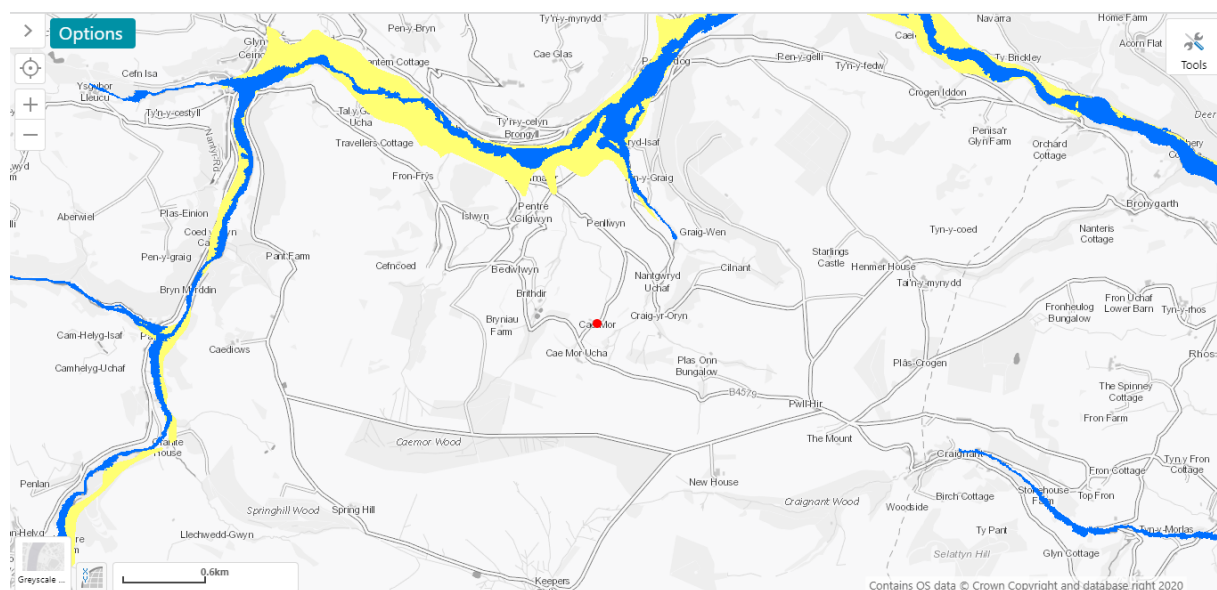
Currently the dirty water from Cae Mor farm is not treated through any system but is applied to the land for Agricultural benefit in line with regular Soil Sampling of the farm. However in order to have no change in the phosphate produced on farm the dirty water will be collected once per annum by Gamber Logistics Ltd.

The manure from the proposed free range egg unit will all be exported off farm, the manure will be collected by Gamber Logistics as detailed in the Manure Management Plan. The manure will be removed at the end of every crop cycle immediately, this will result in 2 movements per annum.

- Private sewage treatment systems discharging domestic wastewater to ground built to the relevant British Standard (BS 6297:2007+A1:2008) where:
 - the drainage field is located more than 40m from any surface water feature such as a river, stream, ditch or drain, **and**

There are no toilets proposed as part of the development. These are existing.

The plan of NRW flooding confirms the locations of the adjoining watercourses;



- the drainage field is located more than 50m from a SAC boundary, **and**

The drainage field is located more than 50m from the SAC Boundary.

- the maximum daily discharge rate is less than 2 cubic metres (m³).

The poultry unit will produce most of the dirty water during the washdown of the units at the end of each cycle. There will be one full cycle per annum. The dirty water will be exported off farm once per annum.

The cleaning of poultry units has improved greatly, with an emphasis on removing the litter using air blowers rather than water. The litter is then blown to the end of the shed and removed safely to manure storage. Some water will be required to be used to completely clean the unit, though some of the water would evaporate whilst heated pressure washers were used.

Based on using two pressure washers to clean down the unit over three days the volume of water produced would be 7.56 cubic metres within the units, and consideration must be given to the dirty yard areas, therefore over three days it is anticipated that 12.5 cubic metres of dirty water would be created each day.

7.6 cubic metres x 3 = 22.8 cubic metres

12.5 cubic metres x 3 = 37.5 cubic metres

Total dirty water = 60.3 cubic metres

60.3 x 1 cycles = 60.3 cubic metres of dirty water per annum

Over 365 days this results in 0.16 cubic metres of dirty water per day. This is below the Phosphate Regulation of 2 cubic metres per day and will be reduced further following evaporation of the water.

The dirty water will all be held in the dirty water tank and then exported off farm by Gamber Logistics Ltd once per annum resulting in two movement per annum.

River Dee and Bala Lake SAC

The applicants do not wish to damage the River Dee and Bala Lake SAC and have commissioned reports from experts in the field to ensure that there is no detrimental impact on the protected sites, particularly River Dee and Bala Lake SAC being:

-  Ammonia report
-  Manure management plan
-  Pollution prevention plan
-  Preliminary ecological appraisal

Specifically, the impact of the proposed development upon protected sites is covered by the ammonia report. The report confirms:

- Under all three Scenarios, the process contribution to the annual ammonia concentration would be in excess of 1% of the Critical Level and/or the Critical Load at closer parts of Afon Dyfrdwy SSSI/SAC. The extent and magnitude of the exceedances depends on the proportion of ranging/housing emissions assumed.

- Under all Scenarios, the process contribution to the annual ammonia concentration and the nitrogen deposition rate would be below 100% of the precautionary Critical Level of 1.0 µg-NH₃/m³ at all AWs considered.
- Under all Scenarios, the process contribution to the annual ammonia concentration and the nitrogen deposition rate would be below 1% of the Critical Level and Critical Load at Castell Y Waun A'I Barcdir SSSI and Berwyn SSSI/SAC/SPA.

NRW in their response dated 15th November 2021 have confirmed that they are satisfied that the process contribution and background levels do not exceed the critical level for Afon Dyfrdwy SAC/SSSI.

Ranging Area

Phosphates have been considered as part of the proposal ensuring that there is no increase in the creation of phosphate on farm. Currently the ranging area is used for the grazing of cattle and sheep and fertiliser is also spread on the land. The ranging area will no longer be used for the grazing of cattle and sheep and no fertiliser will be spread on the land. All of the manure produced from the poultry unit will be exported off farm in sheeted trailers, no manure from the poultry unit will be spread on the land. NRW recognise that in free range units, manure will be deposited upon the ranging area. It is recognised that during the course of the flock cycle, the birds will only range 20% of the time.

The manure from the birds that lands on the ranging area is unlikely to exceed risks from other livestock use of this land (we refer you to GeoWaters letter dated 3rd February 2016 which was produced for the applicant for application reference P/2015/0810).

- Also, to ensure that there is no significant in combination effect, the discharge to ground should be at least 200m from any other discharge to ground. The density of discharges to ground should also not be greater than 1 for every 4ha (or 25 per km²).

There are no discharges to the ground within 200 metres of the proposed soakaway.