

Wrexham County Borough Council
By email

Date: 15/11/2018

Dear Sharon Holman,

Bwriad / Proposal: STEEL PORTAL FRAMES AGRICULTURAL LIVESTOCK BUILDING
Lleoliad / Location: EAST VIEW FARM, COBBLERS LANE, BURTON, ROSSETT, WRECSAM

Thank you for referring the above planning application received at our office 26/10/2018.

We have significant concerns with the proposed development as submitted. We recommend that you should only grant planning permission if the scheme can meet the following requirement. We would object if the scheme does not meet this requirement.

Requirement: Further information to demonstrate the proposals will not result in any pollution to the Nitrate Vulnerable Zone or any watercourses due to lack of capacity of the slurry store

Agriculture

Further to our previous response dated 14/09/2018 ref CAS-67706-G4V2, NRW notes that the applicant has confirmed the following:

- All of the wash water is included in the store
- Amended the 80% of a milking cow group for November- February to 100% with the other months at 80% to account for grazing animals.
- The proposal is to now put in place a dirty water tank for the rainfall running off the forage storage, to be completed before any development.

NRW also note the submission of a revised Manure storage report.

Requirement: Further information to demonstrate the proposals will not result in any pollution to the Nitrate Vulnerable Zone or any watercourses due to lack of capacity of the slurry store

We note that the rainfall entering the slurry store is calculated using the area of the slurry store and an extra 914m² of dirty yard / silage clamp that drains into the store. This figure does not tally with our records which indicate that all five of the silage clamps drain to the store and have a surface area of approximately 2000m² to add to the slurry store area. Clarification is sought for this point, in the form of a plan or some indication to show what drains into the slurry store and if the clamps do not, then evidence of where they drain to.

The storage capacity of 4957m³ is compliant with the NVZ regulations from the figures supplied as the NVZ storage capacity can be worked out pro rata to the percentage of the land area that is within the NVZ. As 47% (approx.) of the land is within an NVZ, then the farm would only need to

store this percentage of the total slurry, wash water and dirty water generated over the five-month storage period. It is also worth noting that these land area figures have altered significantly since the last inspection.

The new slurry store was built in 2011 and therefore must be compliant with the storage requirements of the SSAFO regulations. The store must therefore hold a minimum of four months slurry, wash water and dirty water generated. The rainfall is also calculated using the M5 120 maximum rainfall figures for these four months. From the figures supplied, the store does not seem to be compliant with the SSAFO regulations storage requirements with the increased stock numbers.

Therefore, the applicant must demonstrate that the farm has adequate slurry/manure storage to comply with the SSAFO Regulations 2010.

We note there is no proposal to either extend the current slurry store or to add any new additional slurry store on the farm within this proposal.

If the slurry to be produced is to be directed to the existing slurry storage any new channel or pipe work to convey the slurry will have to comply with the requirements of the Water Resources (Control of Pollution) (Silage, Slurry and Agricultural Fuel Oil) (Wales) ['SSAFO'] Regulations 2010. Natural Resources Wales must be notified in writing about any new structure(s) i.e. any channels/pipes at least 14 days before it is to be used.

The SSAFO Regulations 2010 require a minimum of four months slurry storage capacity for all slurry stores built or substantially altered after September 1991. The applicant should ensure that the existing store is sufficient to accommodate the increased waste produced to avoid any potential of pollution to the nearby watercourse.

Dirty water and parlour washings must not be allowed to enter surface water drains. In addition, every effort should be made to divert rainwater and clean surface runoff from roof areas and clean yards away from the slurry system, to preserve storage capacity. Surface water runoff should be controlled through a sustainable drainage approach and we would encourage the applicant to explore rainwater harvesting as an energy efficiency/resource saving measure i.e. for washing down or stock drinking.

Site operators should also ensure that there is no possibility of contaminated water entering and polluting surface or underground waters. Guidance on pollution prevention and water saving measures is available from

http://adlib.everysite.co.uk/resources/000/253/271/Best_Farming_Practices.pdf

Protected Species

We note that there is no information about protected species with the application and, therefore, are assuming that your Authority has screened the application and concluded that there is not a reasonable likelihood of protected species being present.

Please do not hesitate to contact us if you require further information or clarification of any of the above.

Our comments above only relate specifically to matters that are listed in our 'Consultation Topics' document (September 2018) which is published on our website: (<https://cdn.naturalresources.wales/media/686847/dpas-consultation-topics-august-2018->

[eng.pdf?mode=pad&rnd=131819256840000000](#)). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

Advice for the Developer:

Pollution Prevention

Any waste excavation material or building waste generated in the course of the development must be disposed of satisfactorily and in accordance with Section 33 and 34 of the Environmental Protection Act 1990. Carriers transporting waste from the site must be registered waste carriers and movement of any Hazardous Waste from the site must be accompanied by Hazardous waste consignment notes.

Suitable pollution prevention measures will need to be in place during construction to minimise any risk of pollution, in particular giving the close proximity of watercourses.

In particular, we refer you to the Pollution Prevention Guidelines

PPG1: Understanding Your Environmental Responsibilities – Good Environmental Practices

GPP5: Works in, near or over watercourses

PPG6: Working at construction and demolition sites

The Guidance are available at the following link:

<http://www.netregs.org.uk/environmental-topics/pollution-prevention-guidelines-ppgs-and-replacement-series/guidance-for-pollution-prevention-gpps-full-list/>

The applicant should be advised that, in addition to planning permission, it is their responsibility to ensure that they secure all other permits/consents relevant to their development.

Yn gywir / Yours sincerely,

Siôn M Williams

Siôn M. Williams

Ymgynghorydd Cynllunio Datblygu / Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales