

Cyngor Cymuned **Glyntraian** Community Council

A COMMUNITY IN THE COUNTY BOROUGH OF WREXHAM

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Report on P/2015/0810 Egg Production Unit (16,000 birds) Cae Mor Llwynmawr

Comment

Glyntraian Community Council objects to this development for the reasons set out below.

The main objections are:

- the visual impact of a large industrial scale building which would be totally foreign in a landscape of natural beauty
- the possible contamination of drinking water for neighbouring properties which rely on wells (no mains water)
- the distance of the proposed site from the existing buildings
- possible erosion of the land where the chickens range, especially around the proposed building.
- No economic benefit to the community
- Security lighting would be intrusive in a 'dark' valley.
- Lack of information about solar gain, range area and underground water tank.

Historical

Cae Mor was run as a small farm until 20 years ago. Since then, some of the land has been sold on, the existing farm buildings have been converted to enlarge the house and the grazing let out to local farmers.

Mr and Mrs Morris also own Pentre Clawdd Farm on the outskirts of Oswestry (approx. 7 acres). Here they have diversified the land with a caravan site, camping pods and growing and selling Christmas trees. It is to this property that they intend to carry the chicken manure.

A similar but smaller egg production business in Tregeiriog ceased business after only a few years. The owner confirmed that free range chickens are noisy and smelly and that chicken manure should be stored for 12 months before spreading on land due to the high ammonia content.

There are no other similar intensive farming businesses in the Ceiriog Valley.

Discrepancies in the supplied information

There are a number of discrepancies between the application form and the supporting information.

Application form

Section 13. Although the proposed building is just over 20m away from a stream, if the concrete pad surrounding the building is included, then this is under 20m.

Section 14b. The land is adjacent to the site is a wildlife area.

Section 16. Trees and/or hedges will be removed to make the new access.

Design and access statement

Section 4. Option D although a better option than A, B or C is still not suitable. The site of the proposed building is on a field approx. 5.5 acres in size, which is not large enough to support 16,000 birds. As stated, 20 acres would be required @ 800 birds per acre. It is impossible to increase the size of the area by approximately more than an additional 5 acres without blocking footpath GLYNTRAIAN 25 and including more water courses to the south or using a designated wildlife area to the East.

The field slopes (see photos) so does not afford a plateau. Extensive excavation will be required. Contrary to the documentation, the proposed site is highly visible from the B4579 from both directions (see photos) and also from across the valley and the AONB boundary. The new access is going to make it even more visible. It will also be visible from footpath GLYNTRAIAN 22 which passes through Cae Mor Ucha. The land nearest to Cae Mor house lies directly between sites A and D but this was not considered.

Section 5. The case referred to is in a very different landscape, much flatter with surrounding infrastructure.

Section 6 & 7. Although trees are to be planted to provide screening from Cae Mor Uchaf, they will take many years to grow tall enough to provide adequate screening, and then only from May to September. The site will still be clearly visible from directly across the valley. The ridge height of the proposed building is over 6m high, much taller than the surrounding hedges. Even if left to grow, hedge trees in the valley rarely grow that tall.

Section 8 & 9. A maximum stocking density of 800 birds per acre is only possible if the total amount of land is used (to provide for the required rotation of paddocks). This is not possible as approx. 10 acres of the land is on the opposite side of the lane, and the previously mentioned footpath, GLYNTRAIAN 25 passes through the land. Fields adjoining that marked in red include a Special Wildlife area and many springs and streams.

Section 10. 18 tonne vehicles and long vehicles will have difficulty access the site safely, having to pass through either Selattyn or Glyn Ceiriog on the B4579 which is very narrow and twisty in places. Although provisions have been made for periods of inclement weather with regard to feed and egg storage, there is no documentation relating to the storage of waste which will be 11 tonnes of manure every 10 days.

Section 11. It is proposed that 86m of hedging is to be removed to provide splays. That is a large amount of hedging to lose, making the proposed building very visible from the road.

Section 12. An underground storage tank is mentioned yet not shown on the plans.

Section 13. 400 tonnes equates to approx. 11 tonnes of manure every 10 days. This would need to be stored on site during periods of bad weather conditions in winter and risk contaminating the local springs.

Chicken manure is considered the hottest among all animal manures and contains the most amounts of phosphorous, nitrogen, and potassium. It is necessary that chicken droppings are composted with mulch with a high carbon content before applying it. If not, the manure will burn any plant or foliage on which it is used. Other negative aspects of the chicken manure are the bad smell and the fact that it is full of fly larvae and eggs. The rate of application for chicken manure differs for pastures and row crops.

Early experiments regarding the issue concluded that that the application of 4 tons per acre produced the best results on grass pastures. The use of 10 to 12 tons per acre produced results that were the same as when no manure was used at all, while **25 to 30 tons per acre wiped out the plants entirely**. In the case of row crops, Les Hileman, the researcher of broiler litter at the University of Arkansas, has established 10 tons per acre to be the optimal application rate. In case of vegetable crops, chicken manure needs to be lightly used at less than 4 tons per acre in fall. The manure should be applied lightly again in late winter. In any case, the high concentration of nutrients in chicken manure, as well as the problems of soluble salts, the build-up of potassium with calcium depletion, and nitrate build-up in plant material require that no more than 20 to 40 tons per acre be used. **If, as planned, all the manure is to be spread on the land at Pentre Clawdd, this would require spreading 52 tonnes per acre every year.**

(http://www.gardenandflowers.com/way_5770279_much-chicken-manure-per-acre_.html)

Section 15. The report is that provided for the previous application (P/2015/0513). The ecological appraisal carried out in June 2015 states “There are no records of bats under a 700m distance from the site and no information of roost sites was provided under a 2 km distance”. There are at least 3 roosting sites within this area, at Briwnant (430m away), Pen Llwyn (980m away) and The Larches (1.7km away). What provisions are made should bats enter the proposed building and use it as a roosting site? Security measures will include lighting around the building and perimeter which may disrupt the bats’ roosting and hunting activities in the area. This will cause light pollution in an otherwise dark area (see photos).

Section 18 & 19. There is great concern locally regarding the smell and noise from the fans and the chickens. The owner of the Mulberry Inn is concerned that it could affect his business as visitors stay primarily for the peace and tranquillity of the area and the beautiful landscape.

Noise and odour management data is based on typical figures and therefore do not take into account the strange acoustics and wind direction within the valley.

Section 22. Policy GP1 principles a, d, e, f, h, i and k are questionable.

- This application offers little to the local economy which relies heavily on tourism.
- The proposed business does not involve farm diversification or converting existing buildings, but would introduce intensive farming to an area which is not suitable for it.
- The farm is 1.2 miles away from the nearest bus stop so not convenient for public transport.

Policy EC3 regulations are not met i.e.

- “...the development is materially detrimental in terms of its impact on the environment or surrounding landscape.”
- “the development should form part of an existing farm complex...

Policy EC4 regulations are not met i.e.

- Although some trees will be planted, 86 metres of hedgerow will be removed.
- Existing bluebell woodland may be damaged if included in the ranging area.
- The adjacent wildlife area will also be included in the range if 40 acres are required.
- The proposed poultry unit at Cae Mor is **NOT** positioned alongside existing agricultural building as stated: **it is 200 metres away!**

Landscape Character Area SPG

- As stated the site is within Landscape Character Area 4 which is predominantly sheep farming. Current diversification “includes rural crafts, woodland management, low key tourism and recreational facilities and activities including fishing and walking”. Many businesses are reliant on sustainable tourism' for income and are working to 'improve the visitor experience'. Therefore, the Ceiriog Valley is not a suitable area for intensive chicken farming

Section 23. Farm diversification.

How can intensive farming on this scale be considered diversification? This proposal will not benefit the local community or economy: it is more likely to damage them.

Section 25. Site security.

As previously stated, the proposed building would be 200 metres from the house, which would be partially screened from it by trees.

Section 26. Environmental Design Statement.

- Paras 5 and 6 mention “solar gain” but there is nothing in the documentation or plans covering this e.g. roof panels.
- Surface water drainage. This system will only cope with the excess water from the roof and access route. The new road access may allow surface water flowing down the B4579 to be redirected down the access road. If the paddocks become poached and lose vegetation, surface water will be further increased.

Section 27. The proposed building will **NOT** be unobtrusive. The valley widens to form a bowl shape above Llwynmawr so the site can be seen clearly from all around the valley. In fact, the most obscured view of the site is from Cae Mor itself. The site is only 100 metres (approx.) from Cae Mor Uchaf.

Section 30.

- As stated in section 22, this development is not compliant with policy EC3 on a number of points.

- Glyntraian Community Council does not consider that in this case an isolated building should be permitted as there are no exceptional circumstances to be considered.
- The Ceiriog Valley is a place of beauty and tranquillity. Many small businesses in the area (hotels, B&Bs, pubs etc) are trying to promote this aspect.

Concerns

This part of the Ceiriog Valley is particularly scenic with fantastic views. For the most part it is dotted with small farmsteads built from traditional stone and slate. The proposed building would be totally out of character visually and far larger than any other buildings in the area. The visual impact of such a large, isolated metal factory-type building is unacceptable. The proposed tree planting will have no impact for a number of years and will do nothing to hide the site from many viewpoints.

During a campaign to prevent the flooding of the valley for water supply, David Lloyd George described the area as a “little piece of Heaven on Earth”. Chickens will remove the vegetation by scratching, causing a large persistent scar on the otherwise green landscape area.

The photographs, Viewpoints A and B show the site from diagonally across the valley. Photographs below show the proposed site from directly opposite, clearly showing the high visual impact.

The proposed site is in an area of thin, clay-based soils overlying shale and slate. The site is also subject to high rainfall and snow which lies on north-facing slopes for some considerable time.

The field slopes (approx. 1 in 20) which is increased significantly around the proposed building by the planned excavation. The slope of land will mean a high risk of erosion to the ranging area. If the ground is continually scratched up and the plants and roots destroyed there will be nothing to prevent the soil washing down and silting up the streams below.

Local members of the Chirk and Ceiriog Valley Partnership are very concerned about this proposed development as it could harm future chances of gaining AONB status for the Ceiriog Valley.

Whilst Glyntraian Community Council supports farm diversification, this proposed unit is farming on an industrial scale and there is no economic benefit to the local community.

The local road infrastructure is not maintained to a good standard and roads are too narrow and snaking to support the additional large vehicles required to deliver birds, feed, bedding etc., collect eggs and remove waste and birds. Although it is a B road, there are many stretches and bends that are too narrow for two large vehicles to pass each other.

The B4579 is a main route for residents of Glyn Ceiriog and the proposed access/egress point is close to what is considered a restricted view bend. The road through the village of Selattyn is very narrow due to vehicles parking along the road

According to TAN 6, farm buildings should be positioned as close to existing buildings as possible. The original farm buildings have been converted to enlarge the house, a listed building. This

proposed building is quite some distance, approx. 200 metres from the existing Cae Mor buildings, in the middle of a field. The site is closer to Cae Mor Uchaf (approx. 100 metres).

The size of the range is unclear from the documentation. The field boundary (red on plans) is of insufficient size and increasing the range will possibly cause contamination of springs, damage to woodland and a special wildlife area and blocking access to a footpath.

Lack of information makes it impossible to know whether nearby springs and issues will be contaminated by chicken waste and washing down. If so, run off will feed into Nant Gwryd and then into the River Ceiriog, a designated SSSI site, which could be contaminated. The river is a popular fishing area and members of the local Ceiriog Fly Fishing group has expressed concern about contamination.

Farmers whose stock graze the fields through which the water flows are concerned about possible contamination of diseases that could spread to their animals from droppings and waste water.

Local small-scale poultry farmers are concerned about the spread of disease to their own flocks.

Local residents (including children under 5) living in properties below Cae Mor to the west are concerned that their private wells may also be contaminated by water seepage. This is a real cause for concern as their wells fill from water percolating down from Cae Mor land.

Chickens kept in such conditions need regular antibiotics which may also enter the water system.

The Ceiriog Valley is subject to some severe winter weather. In 2013 3 ft. of snow fell over 2 days leaving many roads blocked with snow and fallen trees for up to 2 weeks. The proposed site allows for only 10 days. Roads may be cleared in 10 days but the range may not be accessible for weeks.

The valley also has unique acoustics making sound travel clearly across to the other side of the valley. Fans will create noise nuisance, particularly at night.

The proposed development is in a dark area of the valley (see photo). Security lighting is going to have a drastic effect on this

DEFRA standards of 800 birds per acre will be breached if the proposed site is only approx. 5.5 acres. Standard R 4.1 (RSPCA Welfare Standards for Laying Hens, 2013, p 15.) states the stocking density must not exceed 2,500 birds per hectare at any one time. This standard cannot be met by the proposed application without damaging a designated wildlife area and blocking access to a public footpath.

PV panels will possibly reflect glaring sunlight across the valley.

There are no real employment opportunities or other benefits for the local community.

Appendix

Photographic support.



1. The proposed site from the existing field access. If 86 metres of hedge are removed to allow for splays, the proposed building would be extremely visible along most of the boundary with the road.



2. Another view from the B4579 showing the slope of the land. Cae Mor Uchaf house is just 50 metres above the road.



3. The proposed site from the eastern end of the field. Again, clearly visible in summer and even more so in winter.



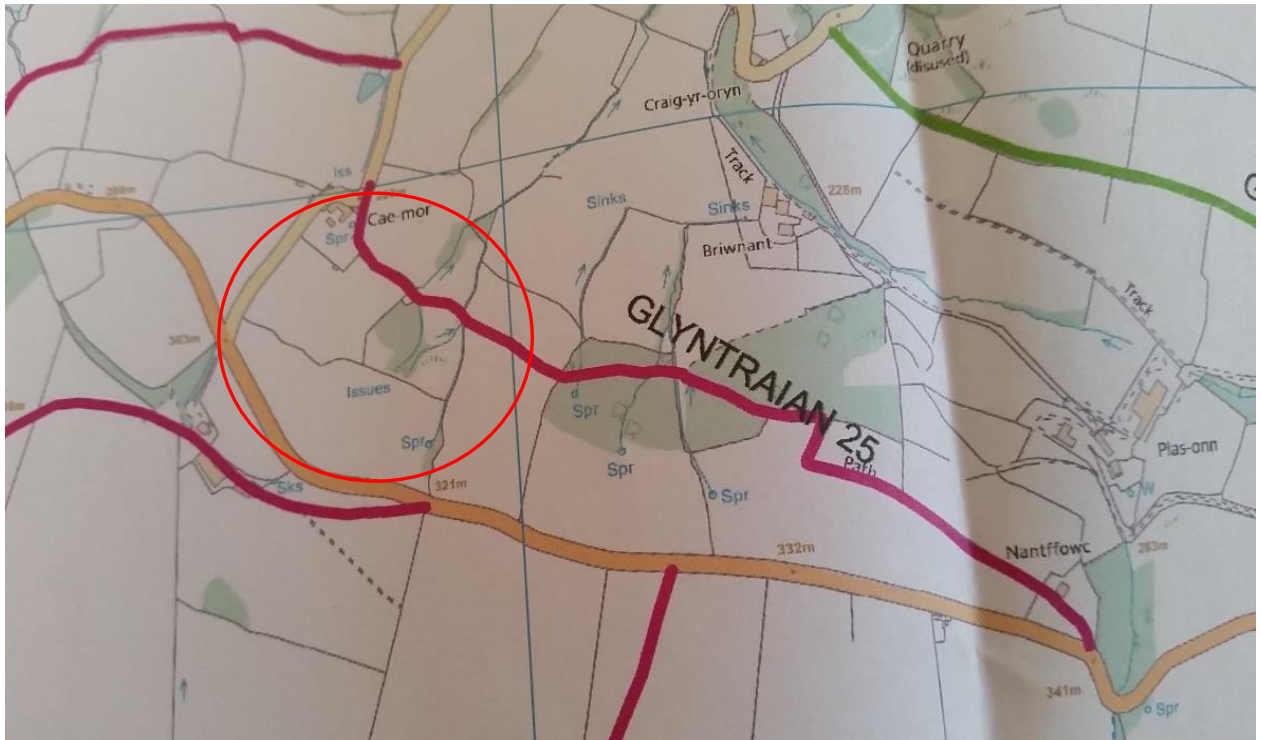
4. This photo from the B4579 clearly shows the slope of the land and the distance from existing Cae Mor buildings. It is also clear from this photo that the field is clearly visible from many aspects of the valley.



5. The site is also visible from across the valley.



6. The same view in winter. Without leaves, the trees do not screen the field well at all.



7. Footpath GLYNTRAIAN 25. The range required by RSPCA cannot be met without crossing the footpath or using land currently designated a special wildlife site.



8. Cae Mor at night. The sides of the valley are 'dark' areas with no streetlights or any other bright lights. Security lights would be highly intrusive.

References

RSPCA Welfare Standards for Chickens. 2013. RSPCA.

http://www.freedomfood.co.uk/industry/media/34115/rspca_welfare_standards_for_chickens_november_2013_web.pdf

RSPCA Welfare Standards for Laying Hens. 2013. RSPCA.

<http://science.rspca.org.uk/sciencegroup/farmanimals/standards/layinghens>