
Ammonia Assessment

**Land at Merehead
Big Arowry
Whitchurch
SY13 3EJ**

Milking Parlour and Handling Area



land & property
professionals

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1.0 Background

The Natural Resources Wales Guidance Note – Assessing the impact of ammonia and nitrogen on designated sites from new and expanding intensive livestock units (Reference GN0200 is the technical guidance for determining environmental permit applications or responding to planning application consultations).

GN020 explains how to assess the impacts of ammonia emissions and nitrogen deposition from intensive livestock units on designated sites.

This Ammonia Assessment assesses the proposed development using the GN020 guidance note.

2.0 Intensive Livestock Units

The GN020 guidance note explains how to assess the impact of predicted ammonia and nitrogen emissions from intensive livestock units.

The proposed development is for a milking parlour and handling areas at Land at Merehead, Big Arowry, Whitchurch, SY13 3EJ. The milking parlour will be a 24 x 48 milking parlour with bulk tank room, stores and farm office. It is proposed that 150 cows will be milked through the new milking parlour. Therefore, we do not class the proposed development as being an 'intensive livestock unit'.

As defined by the Environmental Impact Assessment Regulations and NRW dairy cattle are not considered to be intensive livestock requiring an Environmental Permit, only pigs and poultry units require an Environmental Permit. Within Schedule 1 Part 1 of the PPC Regulations, the intensive farming listed activities are found in Section 6.9 A (1), namely:

(a) rearing of poultry or pigs intensively in an Installation with more than:

(i) 40,000 places for poultry;

'Poultry' means chickens, turkeys, ducks, geese, guinea fowl and quail whether raised for meat or for egg laying.

(ii) 2,000 places for production pigs (over 30 kg); or 'Production pigs' are pigs, male or female, grown from a weight of 30 kg to the point of sale for either breeding stock or slaughter.

(iii) 750 places for sows.

Sows' includes 'gilts' and 'sows'. 'Gilts' are female pigs intended for use as breeding stock, after they have 'left the production

Directive 85/337/EEC (2008 - 022) on the assessment of the effects of certain public and private projects on the Environment (EIA Directive). Interpretation of definitions of certain project categories of annex I and II of the EIA Directive.

The document provides a definition of the following under 2.3 Projects Listed in Annex II under Annex II (1) Agricultural, Silviculture, Aquaculture:

(e) Intensive livestock installations (projects not included in Annex I)

This project category can be considered to include installations for the concentrated rearing of livestock either in purpose-built units or in areas dedicated to this activity, either indoor or outdoor.

NRW do not provide any definition within their GNO20 document, of what they determine to be Intensive Livestock, or any justification of this being used as one of their reasons for not approving the application.

The proposal on the farm is not an intensive livestock unit as defined in the EIA directive aforementioned given that the unit will solely be a milking farm for dairy cows.

Further definitions of intensive livestock units are as follows:

According to the Natural England Research Report NERR030 6 Nutrient and pollution management – intensive livestock, it is defined as:

6.3 Intensive livestock production in the context of this chapter covers animals kept predominantly in housed environments, where all fodder and bedding requirements are delivered to the animal

The proposed development does not allow for the dairy cows to be housed. The dairy cows will be grazing the grassland surrounding the milking parlour.

A UK Parliamentary Post Note (Number 404, dated March 2012) states that 'Intensive livestock systems house large numbers of animals using a relatively small area of land'. It then goes on to say that 'While there is no specific definition of the term, it is used to describe livestock facilities that are much larger than the UK average (see Table 1)'. Table 1 has been extracted below:

Industry	UK average 2010	Proposed UK super farms	Global examples
Dairy (no. of cows in herd)	113	1,000 (Powys)	37,000 in Saudi Arabia
Pigs (no. of sows in herd)	148	2,500+ (Foston)	10,000+ in USA

Comparing the proposed development of a milking parlour for 150 cows to the figures within the table above, it is clear that the proposed development is not on the same scale as an intensive dairy unit, and therefore this application should not be subjected to the same assessments as an intensive unit. The cows to be milked in the proposed parlour will not be housed in the same building, after being milked they will exit the parlour to go out to graze and therefore it can not be classed as an intensive unit.

The current stock levels at the farm is 150 milking cows. This is due to remain the same and will not increase above 150.

3.0 Conclusion

Due to the proposal being for a milking parlour for 150 dairy cows and a handling system where all of the cows go out to graze with no feed or bedding having to be brought to the cows, this is not an intensive dairy unit and should not have to comply with the GN020 guidance note.