

Head of Environment and Planning
Wrexham County Borough Council
16 Lord Street
WREXHAM
LL11 1LG

23 February 2017

Er sylw / For the attention of: Philip Forster

Annwyl / Dear Mr Forster

TOWN AND COUNTRY PLANNING ACT 1990
DEDDF CYNLLUNIO GWLAD A THREF 1990

BWRIAD / PROPOSAL: Erection of additional agricultural poultry barn building for egg production (to house 15,700 birds) including link to existing building and 2 no. feed silos

LLEOLIAD / LOCATION: Talwrn Farm, Talwrn Road, Legacy, Wrexham

Thank you for consulting Natural Resources Wales (NRW) about the above, which was received on 25 January 2017.

We recommend that you should only grant planning permission for the scheme if it can meet the following requirement, to address significant concerns that we have identified. Provided this requirement is met, we would not object to the scheme.

Requirement: Manure Management Plan – Submission of a management plan including details regarding storage, spreading etc. arrangements onsite.

Manure management Plan:

The application is not supported by a specific Manure Management Plan. Although the Design and Access Statement refers to manure management (for the existing and proposed (Para.5)) this statement does not constitute a Manure Management Plan.

Requirement: Manure Management Plan – Submission of a management plan including details regarding storage, spreading etc. arrangements onsite.

The Design and Access Statement and application form state that poultry manure is to be removed from the site at the end of each 52 week cycle. The Manure Management Plan should include further details on this aspect and should include the location of where the manure is to be exported, and what contingency measures that will be in place in the event that it cannot be taken.

In particular, any contingency plans that include spreading of manure, would need to be supported by plans showing the location of the fields that manure is to be spread on site. This is to ensure no run-off into any protected sites area.

Confirmation would also be required that there is sufficient land available to dispose of the manure arising from the proposal at a rate that is consistent with COGAP recommended upper limit of 250kg/ha.

The applicant should be advised to provide contingency for the storage of manure produced so it can be stored and applied to land when conditions are favourable and when there is crop requirement.

Please note that CoGAP advises that the location of field heaps should be rotated every 12 months and manure not returned to the same site within a period of 3 years. Heaps should be located to avoid run off to watercourse or groundwater being located at least 10m from any watercourses, and 50m from any well, spring or borehole.

Waste

Any waste removed off site (e.g. manure, contaminated effluent) will need to be accompanied by a relevant waste transfer note.

With respect to the landscape bund to the east of site, if the material forming the bund is waste, rather than product then an exemption may need to be registered with Natural Resources Wales.

The proposed work is close to a small ditch which feeds into larger watercourse - Pentrebychan Brook. The applicant should therefore, be recommended to carry out relevant pollution prevention measures in accordance with: GPP 5: Works and maintenance in or near water.

Sites

The application site is 1.8km away from Stryt Las a'r Hafod SSSI/ Johnstown Newt Site SAC. It is 2.7km from Ruabon & Llantysilio SSSI/Berwyn SAC. There is no direct effect of this application upon features of those sites.

Species and Air Quality

The application is supported by an ecological submission (reference: Emms, C. and Barnett, L. (2016). Extended Phase 1 habitat Survey: Talwrn Farm, Legacy, Wrexham. Craig Emms and Linda Barnett. Unpublished.

NRW does not agree with some of the cited introductory statements in respect of Great Crested Newt, as it is considered that these references are, in respect of dispersal out of data and field research and taken out of context.

However, we do consider that the submission is satisfactory for the purposes of informing the planning decision making process and concur with the results of the field assessment and conclusions.

In terms of Species, Newts are not sensitive to ammonia concentrations or nitrogen deposition but any terrestrial habitat that they use for feeding will be.

We have noted the aerial contributions from the proposed development on the relevant designated sites. The farm process contributions approach 4% of the relevant ammonia critical level and nitrogen critical load but they do not exceed the threshold that would require detailed modelling.

Only for Berwyn does the ammonia exceed our initial screening threshold. However, as this is below 20% we would not expect detailed modelling.

As with the ammonia above, it is only for Berwyn that the nitrogen deposition exceeds the initial screening threshold. However, we would not expect detailed modelling as the farm contributes less than 20%.

In view of the above, we have no objection to the proposals from a European and British protected species perspective

Please don't hesitate to contact me if you require clarification on the above.

Our comments above only relate specifically to matters that are included on our checklist "Natural Resources Wales and Planning Consultations" (March 2015) which is published on our website: (<https://naturalresources.wales/planning-and-development/planning-and-development/?lang=en>). 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. 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

Meryl Read

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Uwch-gynghorydd Cynllunio Datblygu / Senior Development Planning Advisor

Cyfoeth Naturiol Cymru / Natural Resources Wales