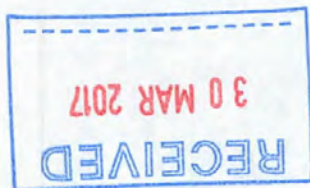


CYNGOR CYMUNED SESSWICK

SESSWICK COMMUNITY COUNCIL



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Planning Inspectorate
Crown Buildings
Cathays Park
Cardiff
CF10 3NQ

27th March 2017

Dear Sirs,

Town and Country Planning Act 1990

Section 78 Appeal

Planning Inspectorate reference: H6955/A/17/3167412

Wrexham County Borough Council planning reference: P/ 2016/ 0533

Site address: Land North of Cross Lanes roundabout, between Sesswick Way and Bedwell Road, Cross Lanes, Wrexham

Site description: Erection of two broiler chicken rearing buildings (each measuring 101.019m x 23.365m) and housing up to 40,000 chickens each, to be served by 4 feed bins and a wood chip bin, erection of associated control rooms, feed- weighing rooms and mess facilities, construction of an agricultural storage building and temporary siting of mobile living accommodation in connection with operation of the development

Sesswick Community Council objects in the strongest possible terms to the above application at the suggested site. It is utterly unfitting and insupportable in the given location. I attach the council's initial response to the consultation, which I understand has been brought to your attention.

The applicant states "the proposal is considered to be acceptable in terms of policy EC3 of the Wrexham UDP" (APP01, section H). However, in APP08, point 2, it continues "such a policy... should have limited bearing when considering the proposed agricultural scheme". How can one claim adherence to a policy, but then contest it should be disregarded? The policy, relating to agricultural buildings, clearly states that new isolated buildings "are only permitted if they form part of an existing farm complex". The application is blatantly not compatible with that policy as the site is a green field

in open countryside. Using the name "Black Rock Farm" would mislead anyone who did not know the area, as it suggests the existence of farm enterprise that is just not there.

This council resolutely supports the county- council interpretation of policy EC3 in this planning decision. It has been put out to the community for consultation, been democratically approved and is the unambiguous yardstick against which applications are to be considered. The conjecture in point 3vi in APP08, declaring that "the UDP has been superseded by the Well- Being of Future Generations Act 2015 and the Wales Animal Health and Welfare Framework", is extremely objectionable in its insinuation that the county council's unitary development plan is now obsolete. Surely it is not for applicants to decide the rules by which their plans are to be judged, so as to obtain the result they desire? Sesswick Way may be the "most suitable" of the plots the applicants visited and which was purchased as a result of advice obtained. That certainly does not permit the planning regulations being used in such a contrived manner to imply acceptability, as any equitable reading of the requirements would find such an application unacceptable. Even if there is a supposed need to increase chicken production at a macro- level, one cannot imagine any piece of local or national legislation that could be deployed to impose a development such as this, in a setting so unfitting for the purpose, and which is devoid of any local support.

The "exceptional circumstances" mentioned in policy EC3 which would permit this development have not been evidenced satisfactorily in the appeal files. The conclusion in APP08 is extremely generic, referring nebulously to "the countryside" in general and fails to convincingly explain the specific new factors which should be taken into account. There is no proven agricultural need and it is certainly not demonstrated in any way whatsoever why Sesswick Way is so uniquely qualified as the prime location. There are arguably sites available on the nearby Wrexham Industrial Estate, merely a couple of miles away from the proposed development, which would be far more suitable. These too would be equally well- placed in terms of all the facilities quoted, and with an even better road network, with excellent access in and out of Wrexham via the northern and southern access link roads. Maybe the applicant should had considered this possibility prior to purchasing the land in Cross Lanes.

The statement that "the location is not of high landscape value, and consequently the development proposed is not considered to be detrimental to the local environment or the surrounding landscape" (APP08; page 2, point 1) is dubious in the extreme. People living in this community would contest that the site does have agricultural worth and should be so employed. Its positioning, at the entrance to the rural hamlet of Cross Lanes would be an egregious eyesore and within view of several homes. A children's activity centre, accommodating hundreds of primary school pupils each week, is due to open next year and will be located just across the road from "Black Rock Farm". In short, this proposal is totally inappropriate for this village location and would have a negative impact on residents' quality of life. The community of Sesswick is agricultural in nature, with a number of traditional family farms. This almost industrial- scale facility would be alien to this backdrop.

This council qualifies the assertion that the highway network is "exceptionally good". The recently- constructed southern access link road to the Wrexham Industrial Estate sees heavy volumes of high speed traffic of 60mph+, of which the police are aware. This will undoubtedly increase further as the nearby 2,000- men prison is opening. Slow- moving HGVs entering and exiting the proposed broiler site would be an undeniable risk to motorists, especially as one assumes most vehicles from the complex would be turning right and therefore having to traverse both lanes of the highway. Rush-hour is a particularly perilous period, with the potential for queuing traffic at the site entrance

The comment regarding the perceived convenience vis a vis the Maelor Poultry plant is a red-herring. The documentation admits this site would need input from another 32 poultry farms of a similar size for its operations. As "Black Rock Farm" would therefore only contribute 3% anyway, its suggested importance is grossly overstated.

Page 5 of the APP09 advises "the proposal clearly meets this element of creating and maintaining sustainable rural economies". With only four full-time workers proposed, its contribution is negligible and unpersuasive.

Page 7 of APP09 informs "as with any system that relies on mechanical equipment, failures are not uncommon and it is essential for someone to be onsite at all times to respond immediately". Such a statement regarding the probability of regular process malfunctioning is most disconcerting. One fears what the implications may be in terms of biosecurity, noise levels and odour pollution for those living nearby, especially if the issue be difficult to resolve. Should contaminants and toxins seep down from the site, there is a real danger that these may find their way to the nearby brook and then readily into the river Dee. The effects of such a leak on the environment would be truly chilling

This council therefore continues to firmly believe that this application should not be permitted.

Yours faithfully,

A black rectangular box redacting the signature of Ian Griffiths.

Ian Griffiths
Clerk

Planning application P/2016/ 0533: erection of two broiler chicken rearing buildings on land north of Cross Lanes roundabout between Sesswick Way and Bedwell Lane

Sesswick Community Council vehemently opposes this application

This intensive factory- style farming method is not suitable or acceptable in close proximity to a housing estate and abattoir for human food production. Also, it should be well away from water courses which may be subject to contamination.

The design and access statement is sketchy, vague and inadequate in that it makes no reference to vital considerations.

- 1 The plan shows the proposal in isolation to surrounding neighbouring features and the environment.
- 2 The plans, in particular field divisions, are inaccurate and misleading.
- 3 There is no acknowledgement of the proximity to a large residential area to the southeast and individual houses to the north and an abattoir (for human food production) to the north east. Specifically, the plans allude to the complex being situated close to Five Fords Farm, and not near the bridge on Bedwell Road. This gives a false impression to residents who would not realise this development is so close to their homes.
- 4 The plan does not show the proximity to Bedwell Brook, which flows into the Clywedog and directly into the river Dee
- 5 The land is good quality farm land, suitable for grazing animals and fodder production

Major concerns

- 1 its proximity to a large residential area, subject to possible further housing development in the future, downwind of the proposed site. The prevailing winds are westerly
- 2 there is no reference to possible noise pollution/ nuisance, potentially occurring day- and- night
- 3 there is no reference/ studies to possible air pollution/ smells on account of the numerous vents and fans, or reference to the air filtration system. The local area suffers enough from air contamination from the existing facilities very close to these units. The air can at times already be so putrid that people are unable to be in their gardens during fine weather because of the bad air and flies.
- 4 the visual impact on the landscape amenity. The ridge height of 5.681 metres will be exceeded by the feeding bins and extractor fans. The existing hedges and trees will in no way act as sufficient screening
- 5 the proximity to Bedwell Brook. The proposal suggests that roof water and yard water is discharged into what is essentially a soak-away system which cannot work properly in an area of heavy clay. Also, yard water is likely to be contaminated with diesel, disinfectants etc These will seep into the water table and Bedwell Brook
- 6 it is proposed that the internal wash-downs and dirty water will be collected in a sealed underground containment tank. There is no indication of measures to ensure that there are no leakages should the tank fail or overflow. There is no evidence of procedures to prevent accidental escape, or on how these processes are monitored, especially at times of high rainfall.
- 7 There appears to be an underground drainage pipe of some kind coming from the direction of the proposed site and emerging from the ground in the next field near Bedwell Brook

- 8 Access on to the highway is especially treacherous on account of heavy industrial traffic throughout the day and particularly at rush hours at speeds of 60mph plus. Slow- moving vehicles entering & exiting the site represent a real danger, against which improved visibility splays and a new slip road could never satisfactorily mitigate
- 9 There is a chicken breeding complex in the neighbouring district of Isycoed. Once established, it grew to comprise 5 buildings of similar size to those in the proposal. The proposed field could easily take more buildings in the future.
- 10 This new proposal would bring about an excessive number of chicken breeding buildings within a small area.
- 11 A mobile home and mess facilities are to be incorporated into the plan, but there is no mention of where the sewage and related facilities are to go
- 12 It is unacceptable that the staff looking after the birds 24 hours-a-day will apparently be living in a mobile home on- site. An application for a house should be made. In past applications, workers living in mobile homes were told to move out.
- 13 there is a pond on the site which will contain the greater crested newts. The habitat of this protected species may well become contaminated.
- 14 this facility will spoil the rural aspect of the area. Bedwell road is becoming a lane for residents to walk, cycle, and horse ride as there are few enough public facilities in Cross Lanes.
- 15 the potential for vermin is a huge concern. Chicken feed and carcasses are an enticement for rats, foxes etc. The diseases these scavengers carry are a health risk to humans and livestock. The risk of botulism being spread by carrion has been realised in other areas where such facilities exist. Allowing the application would be foolhardy given the prevalence of dairy farming in the area.
- 16 It seems that the poultry manure and wood shavings will only be removed from the buildings at the end of each cycle. It is not clear how 37 days of avian excrement and the accompanying stench can be safely contained in the building. No interior designs have been provided to demonstrate how this would be achieved.