



**BRECON AND RADNOR
BRANCH**

2nd July 2019

Submission to the Petitions Committee.

Petition 1305 Expansion of intensive poultry farming in Wales

BRB-CPRW warmly welcomes the letter with accompanying information on the proposed Town and Country Planning Intensive Agriculture Working Group dated 25/6/19 from Julie James AM, the Minister for Housing and Local Government to Janet Finch-Saunders AM, Chair of the Welsh assembly Petitions Committee.

We are very grateful that, in response to our request, external participants are now to be invited to the Town and Country Planning Intensive Agriculture Working Group. We trust that external participants will be included in all meetings.

We have not yet received the invitation “*recently sent out*” but look forward to getting it soon.

Our response is divided into:

- response to the new documents about the **CPIAWG**
- the progress of our petition

NEW DOCUMENTS & CPIAWG

What development will the CPIAWG consider?

We note that the **CPIAWG** will be considering Planning issues. To some extent, this will determine what “intensive agriculture” practices will be considered because many intensive agriculture practices will fall outside the Welsh planning regime.

Nevertheless it should be clarified whether the CPIAWG is to consider:

- All intensive livestock farming, including cattle, pigs, poultry, game-birds or any other reared-animals – the Draft ToR mentions poultry farming in 6. & 7. but there are also permitting thresholds for pigs and cattle farming practices where numbers and densities merit the term intensive..
- Buildings associated with any other type of intensive farming.
- Development which requires planning permission and is a consequence of intensive livestock farming and contributes to the impacts. E.g. anaerobic digesters, biomass units.

One important role of the group should be to grapple with the definition of “intensive agriculture”.

ToR 1. Drivers for intensive animal rearing and future expansion

Intensive animal rearing has been partly driven by RDP grant aid and the WG itself appears to have no reliable figures on the extent of the industries concerned. This may have resulted in risky exposure of farmers to market volatility. WG should be genuinely looking to secure the long term security & interests

of the Welsh farming sector and the Welsh environment. Many think this requires better support for high quality, low impact farming.

ToR 3. Issues resulting from Intensive livestock farming

Issues not mentioned are:

Green House Gases – contribution to global warming.

Damage to Welsh soils – impact on future farming.

Pharmacological practices (antibiotics, growth promoters etc.) – drug-resistance to human pathogens

Damage to landscape and settings of heritage assets .

Damage to other businesses, particularly tourism

Impacts of industrial scale traffic on rural roads

“Modern slavery” character of arrangements for unpalatable work

ToR 4. Intensive Agriculture and Ammonia

We have yet to see the National Air Quality Control Programme for Wales. The Air Quality Plan failed to consider control of ammonia emissions in the countryside although ammonia emissions are rising and ammonia is a precursor for PM_{2.5} particulates which form in combination with traffic generated pollutants. Agriculture is responsible to 88% of ammonia emissions.

ToR 5. Regulatory Regimes

Nitrogen Vulnerable Zones are mentioned although this is something an own-goal since they only cover **3% of land in Wales** as compared to **55% in England**. In her Written Statement (13/12/17) following the WG NZV consultation, Lesley Griffiths said she was “*minded to introduce a whole Wales approach to tackling pollution from agriculture*”. This has not happened: NRW is still approving intensive livestock manure management plans spreading roughly 50% more manure on our steep hillsides than is allowed in NVZs. Council environmental health teams are simply not equipped or funded to investigate statutory nuisance from ILUs.

ToR 6. NRW Environmental Permits

We dispute that the increase in sub-permit threshold IPU is “*anecdotal*”. In sheer frustration at the refusal of authorities to acknowledge the facts about expansion in IPU, BRB-CPRW produce an inventory of Powys Planning Application for IPU. In Powys, only approximately 50 out of 250 IPU (20%) require NRW permits. We attach the list for the past 3 years which includes one application approved for 39,999 birds (P/2017/0810).

ToR 7. LPAs & LDPs

Powys CPRW fought hard to have Intensive Farming included in the LDP at the Inspector’s LDP Examination in 2017 but received no support from the LPA or the Welsh Government who attended the Examination. The perception of non-farming residents (and some farmers) is that the farming sector is favoured in planning decisions. Most IPU are decided under delegated powers. LPAs have been starved of funds and disempowered to the point where very clear leadership, support, funding and insistence on the highest standards of professionalism by WG is needed.

ToR 8. CPO letter 12/6/18

Unfortunately, the CPO letter gives no detailed guidance to LPAs who are therefore able to say they have “considered” the advice without properly assessing the issues.

ToR 9. A separate Health Working Group

This is most welcome – we hope it will not be delayed too long.

10. Role of Working Group/ Purpose Statement

We appreciate that the CPIAWG is concerned with the Planning System and we believe that if the eight bullet point goals are satisfactorily achieved and implemented this will be a huge step forward.

PROGRESS OF OUR PETITION

Our petition was not only about planning.

We asked the WG to use its powers to:

1. Provide proper resources for NRW to do urgent research, regulate and monitor IPU's and give better planning help to Local Planning Authorities (LPAs).

2. Issue planning policy and guidance to LPAs to improve decisions, ensure cumulative impacts are considered and monitor and enforce planning conditions.

3. Make the industry contribute towards the costs of regulation and monitoring and hold it to account for breach of environmental responsibility.

4. Publish transparent public reports on progress.

The proposed CPIAWG will address part of 1. and 2. above. It does not (so far) address monitoring and enforcement of planning conditions (2. above).

The CPIAWG may identify research needed but it will not ensure this research is funded and done (1. above).

We do not see that the CPIAWG will address the key principle of 3. above: "**the polluter pays**" which, if properly enforced would be a potent deterrent to environmental pollution.

We hope some of the following issues can be successfully addressed the CPIAWG

If they can't, we request the Petitions Committee to ensure they are addressed by other means:

- **Consider the redefinition of intensive poultry farming as an industrial process.**
- **Consider opportunities to reallocate the financial burden of pollution clean up to those creating the pollution**
- **Consider the implications of associated developments: ADs, biomass etc.**
- **Consider EIA 2017 regulations for requirements for mitigations and monitoring of impacts**
- **Consider recommendations to WG for further rural protections e.g. extension of air quality legislation: reduction targets, to include ammonia.**
- **Ensure both assistance, monitoring and enforcement for the new nutrient-management requirements**
- **Liaise with relevant cross border bodies regarding IPU's and relevant legislation/regulation for environmental/social protections**
- **Identify areas requiring stricter nutrient management (NZV equivalent)**

- **Identify areas which have reached or overstepped safe capacity for intensive livestock farming**

The Welsh Government commitment to the Environment

We remind the Welsh Assembly that the Welsh Government has declared a Climate Change Emergency and the Minister for the Environment, Energy and Rural Affairs has undertaken to see that Welsh sustainable development and environmental legislation is used to set **a new pace of change**.

Lesley Griffiths said *“The government has a central role to making that collective action possible”*. She says that the public goods element of new agricultural policy and the updating of the Nature Recovery Action Plan will drive **urgent** action to increase the resilience of our ecosystem in order to reverse the decline of habitats and species.

Recent reports by the Bureau of Investigative Journalism in conjunction with the Guardian have highlighted this emergency.

<https://www.theguardian.com/environment/2019/jun/18/ammonia-pollution-damaging-uk-land-report>

<https://www.theguardian.com/environment/2019/jun/13/ammonia-health-problem-rising-air-pollution>

“Ammonia and nitrogen pollution, mostly from farms, is harming more than 60% of the UK’s land area and hitting the most sensitive habitats for plants and wildlife hardest”

“Over half the land in Wales receives ammonia concentrations above the critical level set to protect lichens, mosses, liverworts and similar plants – keystone species that are vital to ecosystems.”

Our own experience in Powys

Our own experience and data come from Powys. Powys has possibly the largest concentration of intensive poultry units in Europe and it is one of the areas of Wales with ammonia concentration levels and nitrogen deposition loads well above the critical thresholds. Over 100 large IPUs have been approved in Powys in the past three years and many more are awaiting determination. There are already over 7,000,000 chicken-places in Powys which is almost the same figure as the Welsh Government thinks there are in the whole of Wales. Yet, as we write this, yet another Powys IPU application (for rearing of 37,000 pullets) is recommended for approval. This is in spite of it being on a hillside site surrounded by ancient woodland and old parkland trees, and being predicted to result in an ammonia level of roughly 250% of the critical level at the nearest ancient woodland. The manure will be spread at the rate for non-NVZ land although it is on sloping land in the catchment of the vulnerable designated river Lugg. According to NRW, all this conforms to the current regulations and guidance: these are simply too lax.

Powys has also had several intensive pig units installed in buildings approved as “livestock sheds” with no environmental scrutiny whatsoever and no protective planning conditions.

It is over a year since our petition and we want to see “urgency” and “new pace of change” to protect our deteriorating environment, biodiversity and living conditions and safeguard future generations..

Attached:

BRB-CPRW IPU applications to Powys since July 2015 Please do look at this!

