Campaign for the Protection of Rural Wales
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Ms Gemma Bufton
Planning Department Powys County Council,
The Gwalia, Ithon Road,
Llandrindod Wells, Powys LD1 6AA

22/6/21

Dear Ms Bufton

21/0059/FUL | Erection of a poultry building and associated works | Llwyngwilym Poultry Unit Llwyngwilym Rhayader Powys LD6 5NS

Brecon & Radnor branch of CPRW wishes to object to this application.

History of poultry units on the farm

P/2008/1109 Erection of two Free Range Poultry Houses and associated works
P/2009/1238 Erection of a free-range table poultry house and associated works – the two applications amounting to 24,000 free range broilers
18/0463/FUL Erection of a broiler unit, creation of access and all associated works – 55,000 housed broilers. This unit has not yet been built. (Approved 30/6/2020.)
21/0059/FUL | Erection of a poultry building and associated works – 55,000 housed broilers

Poultry unit (same applicant) on adjacent property

20/2115/REM Section 73 application to vary condition 3 of planning approval 20/1115/FUL to allow the building to be used for up to 5,000 free range organic broilers (Poultry)
20/1115/FUL was for general purpose agricultural building 972msq. for housing of existing stock of cattle. No explanation of how this shed contributed to cattle management on the farm was supplied or required.

Tourism diversification developments on Llwyngwilym Farm

18/0608/FUL Engineering operations involving installation of 9 no. underground holiday let units, formation of vehicular access road and parking area together with all associated works
P/2018/0310 Change of use of land to site 2 shepherds huts and 4 pods, erection of a store room and 2 control rooms, installation of a septic tank and all associated works (part retrospective)
P/2016/0424 Siting of 3 shepherds huts for holiday use, erection of shed for storage / utility use and to house biomass boiler, formation of access roadway, installation of septic tank and all associated works

1. Project splitting

CPRW Brecon & Radnor had requested that the 2018 application be treated as EIA on the basis that the cumulative number of poultry on the farm at that time already exceeded Sch 1 thresholds. This wasn't done and we now have the situation whereby the applicant's project for this site is now the construction of a new 110,000 broiler unit in two sheds, but only half of this EIA development has been subject to EIA Regulations requirements. It's essential that this unsatisfactory arrangement doesn't result in an underestimation of environmental impacts of the whole development.

2. Manure Management

4.6 of the ES: '*All of the chicken manure produced in the buildings will be utilised on the farms arable land. The farming area extends to around 2,000 acres (809ha). Prior to spreading the manure will be stored in appropriately sited temporary field heaps'*.
9.4 of the ES states *'The chicken manure produced in the poultry buildings will all be taken off site as and when it is cleared to be stored in a sealed manure store before spreading on the applicants arable land'*.

No manure management plan has been provided, no information given regarding the extent of arable or other land on the farm, how much is owned and how much rented, no land ownership plan is provided, and comments about manure management in the ES are confined to issues of odour and fly control. No information is given about available manure storage capacity, if any, sealed or not.

Section 13.8 'Dirty water and manure management' contains little apart from the statement '*A Manure Management Plan will be produced as part of the permitting process. Manure or dirty water is not spread adjacent to any watercourses or ditches.'* This fails to recognize that the permitting process controls only the operation on the development site itself and activities outside the site are not the subject of the permit or in any way controlled by the permit. We are surprised Berry's and the applicant are not aware of this fact. It appears that a Manure Management Plan has not in any case been submitted with the permit application PAN-013903.

Regulation 17(3)(b) of the Environmental Impact Assessment (Wales) Regulations 2017 sets out that an Environmental Statement is required to include '*a description of the likely significant effects of the proposed development on the environment'*. Land spreading of what will be large quantities of high nutrient manures must be considered within this application. This point was reinforced in the case of **R (Squire) v Shropshire Council (2019)** which makes clear the importance of assessing waste when determining the impacts of a poultry development and concludes that fields where manure storage and spreading will take place must be identified, potential dust and odour impacts modelled, and likely significant effects on the environment and nearby residents assessed.

Temporary field heaps, as NRW have pointed out, are not an appropriate form of storage for poultry manure.

Some idea of the availability of land for spreading can be got by looking at the Manure Management Plan for 18/0463/FUL. This Manure Management Plan (v3) states '*Approximately **510** acres of spreadable ground is available to apply manure and slurry that is within Messrs Powell's ownership.*' Livestock on the farm at the time of the previous application are shown in the table below, also taken from 18/0463/FUL MMP (v3). (The MMP addresses nitrogen (N) only and does not address phosphates, contrary to NRW guidance in GN021.)

Type of Livestock	**Number of Stock**	**Total N produced by each unit of stock (kg/annum)**	**Total N produced per annum**	**Total N produced by type of livestock whilst housed (per annum)**
Suckler Cows	50	60	3000	1,250
Finishing Cattle	250	60	15,000	15,000
Poultry	79,000	0.39	30,810	30,810
TOTAL				**47,060**

We have not found any information on changes to these livestock numbers, except that the ES refers to an additional sheep flock on the farm, numbers unspecified.

Type of Livestock	**Number of Stock**	**Total N produced by each unit of stock (kg/annum)**	**Total N produced per annum**	**Total N produced by type of livestock whilst housed (per annum)**
Suckler Cows	50	60	3000	1,250
Finishing Cattle	250	60	15,000	15,000
Poultry	134,000	0.39	52,260	52,260
TOTAL				**68,510**

The table above, revised to include the present application, does not address the presence of the sheep on the farm and does not include the 5,000 organic chickens[i] for which the applicant has also applied. It also ignores the spreading of the dirty water on the land[ii], and takes N only into account. Applying the reduced spreading rates

(reduced to 170kg from 250kg per hectare each year) under the new water regulations[iii], these figures demonstrate a requirement for in excess of 403 hectares or **995** acres of spreadable land. This compares to **510** acres of spreadable land available as outlined in the 18/0463 application.

Whether or not the applicant now decides to look for export arrangements, NRW's requirement[iv] in the case of 0/1292/FUL (Drewern poultry unit) for a contingency plan, in the event of export of manure being for any reason impossible, must be equally applicable to all poultry farms. It follows that the MMP should be able to demonstrate that all the manure produced in all the applicant's various poultry enterprises should be capable of being used on the applicant's farm in such a way as to deliver agricultural benefit. On the basis of the information currently available this appears unlikely to be possible.

We are pleased to see that NRW have requested the submission of a Manure Management Plan and trust that the Planning Officer will not accept information that falls short of the requirements of NRW Guidance Note 'Poultry Units: planning permission and environmental assessment' (GN021)[v].

Given the likely impossibility of using the manure produced on the applicant's farm, it is probable that the traffic report will need to be revisited.

Manure Management Plan required, taking into account nutrient contribution from dirty water. Details of sealed manure storage and dirty water storage should also be supplied.

3. Ecology & Powys Biodiversity & Geodiversity SPG/CPO letter 23/10/19

In the absence of an MMP ecological impacts of the development cannot be fully assessed.

Mitigation recommendations within the Turnstone Ecology report must be conditioned in full, including the proposed tree and hedgerow planting and means of avoidance of any risk of contamination (recommended 100m buffer) of the field ditch in Field 1 which joins Nant Serth some 330m to the north west and subsequently joins the River Wye SAC and SSSI some 1.2km west of the site.

Not yet taken into account is the likely loss of hedgerow along the B4518 where an extended (160m in each direction) splay will be required by Powys Highways, Transport and Recycling for highway safety reasons. It is confirmed in the ES that a considerable length of mature hedgerow will also be lost on the site of the new access road. The Turnstone ecologist has reported those hedgerows and trees inspected as being mature and good bird nesting habitat. In connection with 18/043/FUL Powys ecologist requested a Hedgerow Compensation Plan, in line with the requirements of Powys LDP DM2, however none has been published on the website or is included within this application.

A tree and hedge buffer as proposed, sited to maximise its capability to capture ammonia emissions, is particularly

important in that it is essential to protect not only the designated sites examined in the Ammonia report but also all local wildlife species and habitats. **CPO letter 23/10/19**: "*…development should not cause any significant loss of habitats or populations of species,* ***locally or nationally and must provide a net benefit for biodiversity****."* When assessing whether the development can achieve any net benefit it must be recognized that newly planted trees and shrubs will take a period of some years before they can begin to play any useful buffering role. Their location in an area of high ammonia concentration prevents them from compensating for biodiversity loss elsewhere.

Evidence of required biodiversity net benefit has not been supplied.

4. Ammonia

In the absence of an MMP ammonia emissions from manure spreading have not yet been considered.

If this application is approved, sheds containing 110,000 broiler chickens will be built on this site. For this reason, the ammonia assessment should assess the impacts of the whole 110,000 bird development which would result from approval. It is not acceptable to approve a new 110,000 bird facility on the basis of two consecutive ammonia assessments, each looking at the impacts of a 55,000 bird facility only. Screening distance or search radius will also need to be extended to 10km[vi] (see Appendix 2). Note that while 3.4.5 contains a reference to '*the in-combination assessment included with Section* 6' there is no Section 6 in the ammonia report.

Appendices A, B, D and E are all missing from the Ammonia Report.

The conclusions of the Ammonia Report rest on the unevidenced assertion (Appendix D being missing from the report) that IPT VentMax 1200 Acid Scrubbers will achieve a 90% reduction of ammonia emissions, and any substitution for this model will be no less effective. IPT Technology website states *'VentMax treats air leaving your poultry house, reducing dust, ammonia and odour levels by* ***up to*** *90%*' [our emphasis] so more information is clearly required. This high % mitigation compares to predicted mitigation of only 70% for scrubbers proposed for 18/0463/FUL and 82-85% in ammonia modelling reports submitted with application 19/0743/FUL. It is also not known how the % mitigation effectiveness of these scrubbers endures, or not, with age, or whether any maintenance shortcomings may affect their ability to reduce ammonia emissions. This requires substantiation.

Ammonia Report 3.4.6: '*The maximum treatment capacity of the units means that under extreme circumstances (i.e. when the ventilation exceeds the maximum design capacity of the scrubbers) a proportion of the air will be vented out of ridge vents to atmosphere. This is similar to the relationship between ridge and gable end fans for a standard (i.e. unscrubbed) poultry building.'* Several scenarios are envisaged where this might happen but dismissed on grounds that temperatures recorded at Sennybridge weather station over the last 5 years have not often exceeded given thresholds. Given predicted hotter summers, it's reasonable to assume that ventilation requirements are likely to increase over the lifetime of the development resulting in higher ammonia emissions.

Planners are supposed to have regard to NRW's Area Statements: '*Area Statements provide a starting point for*

planners to understand environmental issues, priorities and opportunities in their particular area'. From the 'Sustainable land, air and water' theme of the Mid Wales Area Statement: '*Ammonia is toxic to native plants and habitats, and its accumulation and spread in the natural environment can lead to significant damage to habitats and species loss.* ***Ammonia pollution from the increasing number of intensive agricultural units is now a very significant threat to the survival of the rich variety of rare pollution-sensitive lichens scattered throughout Mid Wales. Urgent measures are required to address this ongoing threat to our natural environment****.'* [our emphasis]

Clearly, it is essential that the highest standard of evidence is required, addressing all ammonia sources related to this development and establishing the likely effective mitigation from ammonia scrubbers across the lifetime of the development.

Meanwhile the recent report by the Woodland Trust 'Wood Wise' suggests that ammonia emissions thresholds currently applied are too high to protect trees and woodlands and their associated species.

> *'Worryingly, there is increasing evidence that ecologically significant impacts occur at lower nitrogen concentrations, suggesting that current thresholds are not robust enough. The nitrogen deposition threshold for key components of woodland ecosystems such as the life-support fungi associated with tree roots (ectomycorrhizae) has recently been proposed to be nearer to 5–6kg of nitrogen per hectare per year (N/ ha/y), whereas the current threshold for most woodland in the UK (last revised in 2010) is 10kg N/ha/y.*
>
> *Similarly, the current threshold for the concentration of ammonia in the air is insufficient to avoid impacts on the most sensitive species. It is set at 1µg NH3/m3, but ecologically significant changes occur at levels as low as 0.5µg NH3/m3. There is also growing concern about the impacts of acute toxicity on woodland species arising from spikes in ammonia concentrations during, for example, slurry/manure spreading, so annual mean ammonia concentrations may not be the most robust way of assessing impacts.'*[vii]

Unfortunately, Appendix E of the Ammonia report is also missing and we cannot see the locations of the sensitive 'receptor' sites in Tables 3-6 and 4, which include many (unidentified) Ancient Woodlands, but LLE.Gov.Wales Ancient Woodland Inventory indicates substantial blocks of Ancient Woodland to the west and south of the site at no more than a few hundred metres distance. In the absence of an MMP, we cannot know what sensitive habitats surround fields proposed for manure spreading.

CPO letter 23/10/19 also states "*the attributes of ecosystem resilience (PPW 6.4.9 refers*[viii]*) should be used to assess the current resilience of the site*". The background nitrogen deposition at Llwyngwilym as currently reported on the APIS website is 27.3kg N/ha/year to woodland as compared to currently recommended thresholds of 10-20 kg N/Ha/year and more cautious thresholds referred to above of 5-6 kg N/Ha/year. This is a substantial exceedance and indicates woodland in this area is already under major stress. APIS data now reflects the 2017-2019 three-year average meaning that any nitrogen producing developments not built out and operating since 2019, including 18/0463/FUL and 20/2115/REM, are not reflected in the data. Investigation of the environmental baseline is a requirement of the EIA (Wales) Regs 2017 Sch 4.

‘Critical levels’ are defined as "concentrations of pollutants in the atmosphere above which direct adverse effects on receptors, such as human beings, plants, ecosystems or materials, may occur according to present knowledge” and ‘critical loads’ are defined as "a quantitative estimate of exposure to one or more pollutants below which significant harmful effects on specified sensitive elements of the environment do not occur according to present knowledge" (APIS). It follows that local woodland habitats, even those least sensitive to ammonia/nitrogen, are already adversely impacted by levels of ammonia and nitrogen deposition likely to result in significant harmful effects.

While scrubbers will reduce, but not eliminate, ammonia emissions from the sheds themselves, ammonia will also be emitted from the storage and spreading of manure. It’s clear given the severity of the current situation as reflected in NRW’s Area Statement that any addition to ammonia pollution will conflict with the requirement for the development to produce a net benefit for biodiversity and with the LPA’s s6 ecosystem resilience duty.

Revised ammonia report should reflect scale of whole development (110,000 bird broiler unit), include missing appendices and evidence % mitigation for scrubbers.

5. Landscape

This EIA application proposes a large scale building development industrial in appearance, together with access track, silos, hard-standing for large vehicles, ancillary development including biomass and fuel stores, on a site in attractive open countryside in a remote rural area popular for outdoor tourism - but does not include a report on landscape impact. This is not acceptable.

The application seeks to rely on approval of the previous application as demonstrating acceptability of landscape impacts of this application. This ignores the fact that no assessment of landscape impacts was submitted with the previous application. Powys has no landscape officer and NRW’s remit includes designated landscapes only. In other words, this approach seeks to avoid any professional assessment of landscape impact for a major EIA application but to rely instead on a single sentence of assessment from an unqualified officer in an LPA with a track record of passing almost every IPU application received.

Extract from Powys Landscape Supplementary Guidance (2019):
‘6.29 Paragraph 4.2.33 of the reasoned justification to LDP Policy DM4 requires an LVIA for all development proposals which could have a significant impact on the landscape and/or visual amenity. This includes all wind energy proposals (excluding anemometry masts) and most major developments.

> **Major development is defined in article 2 of the Town and Country Planning (Development Management Procedure) (Wales) Order 2012 as:**
> ‘major development’ means development involving any one or more of the following –
> …
> (d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or,

6.30 Proposals for major development that have the potential to change the landscape and are outside of a settlement as defined in the LDP settlement hierarchy will be required to undertake a LVIA. Development considered to have the potential to cause landscape change includes but is not limited to proposals that encompass new structures, excavation works, changes to topography or the removal of key landscape features. Proposals considered as 'major development' but are not required to undertake a LVIA are those where the structure is already an integral part of the landscape such as a barn conversion.'

EIA (Wales) Regs 2017 confirm the requirement for assessment of landscape impacts.

LVIA to be submitted.

6. Rights of Way

There is a public footpath which passes to the south of the proposed development. The ES fails to clarify how or whether the rights of access and amenity of users will be protected during both construction and operational phases of the development. This has to be resolved. Development Management should also assess the potential biosecurity risks arising – see below.

At present the LPA is overseeing the progressive degradation of Powys's unique rights of way network by allowing poultry and other industrial scale developments to encroach on or even include whole sections of footpaths, bridleways, ORPAs and BOATS. This undermines the attractions of the county to visitors, who are primarily drawn by the prospect of outdoor activity in a beautiful landscape. We attach a report based on survey work carried out in Herefordshire which supports the view that the industrialisation of the countryside and prevalence of intensive livestock developments impacts negatively on tourism: '**Research Briefing: Controversies over intensive poultry unit developments – Dr. Alison Caffyn – Briefing 3. May 2021 Tourism Impacts'** (see Appendix 2)

Clarification re protection of right of way and its users outstanding together with an assessment of the biosecurity risk of the proximity of the right of way.

7. Disease risk

The ES is required to address risks to human health: EIA (Wales) Regs 2017 Sch 4 'Information for inclusion in environmental statements' para (5)(d).

No account has yet been taken, in the assessment of poultry developments in Powys, of the risks of disease which arise from this type of farming and also from the density of the units permitted across the county. We appreciate that Development Control does not have clear advice on this risk but it is our belief that a responsible LPA should urgently seek such advice rather than ignore a potentially catastrophic risk of this nature.

Radio 4 recently broadcast a short series on zoonotic viruses, called The Jump[ix]. The second of the 3 episodes deals

with bird flu and is a good summary of the issues. (This is available to listen to on the link in endnote ix below.) The programme explains how the design of industrial poultry farms and the spreading of poultry manure enables the transmission of dangerous pathogens to humans and other animals: through the powerful roof fans that expel an aerosol of pathogens into the air, which can then spread out and be inhaled by humans and, importantly, through the spreading of untreated chicken manure on farmland which attracts wild birds which in turn become infected with dangerously mutated pathogens from the chicken manure and then spread these deadly pathogens more widely in the environment. Manure can also infect humans.

Poultry shed extractor fans pump out a continuous aerosol of chicken bacteria, viruses, faecal particles, fungi and ammonia into the surrounding environment. The programme explains that the fans can transmit fatal disease pathogens to humans who inhale the expelled aerosols that drift from them. It also describes how mutations occurring in poultry farms are the source of dangerous bird flu outbreaks. In industrially raised poultry avian flu can develop into deadly forms. Indoor poultry farming is an ideal environment for virus mutation and transmission, both between chickens and to humans. Bird flu can be many times more lethal than the current coronavirus. In 1997 the H5N1 Bird Flu outbreak which escaped from Hong Kong poultry markets to infect people had a 30 % mortality rate including children. Some bird flu has a 60% mortality rate in humans[x].

Pathogens borne in such aerosols can infect people several kilometres away from the source. Legionella, for example, can drift in the air to infect people up to 7km or more away[xi]. The proposed buildings are close to non-associated neighbours and to the town of Rhayader itself.

The information given in the BBC programme regarding the disease transmission risk via poultry manure spreading is of very great concern. Planners have a duty to promote healthy and safe communities. The proposed poultry development and its related manure spreading and storage would create an ongoing serious disease risk to the local population and wider environment, and should, therefore, be recommended for refusal.

Even where bird flu outbreaks do not result in human disease, the potential for substantial and widespread economic damage is very real: https://www.theguardian.com/environment/2021/jun/16/is-polands-chicken-boom-behind-its-devastating-bird-flu-outbreak – more than 330 outbreaks of highly pathogenic bird flu since late 2020 has resulted in massive culling and huge economic loss and worst hit regions are those with the highest concentrations of IPUs.

Assessment of health risks required.

8. Noise

Ion Acoustics' report includes background noise readings and predictions of the noise which will be produced by the one 55,000 bird shed which is the subject of the application. The report includes a section titled 'Cumulative consideration' which contains estimates of combined noise of the two sheds operating together, but for only some

of the scenarios presented in the rest of the report. It is not explained how these cumulative predictions have been arrived at. The 2018 application did not include any professional advice on likely noise impacts.

The unnamed building to the south west of the site entrance which is shown on the Location Plan (SA37116-PL01-20201015-V2-LOCATION-343735) is not included as a receptor. This needs explanation. We question also whether the typical background noise picture can be satisfactorily established with the use of only one noise monitor at a single location.

It's not clear to us why the assessment of impact in this report relies on comparison of predicted noise levels to an absolute limit when online guidance on the appropriate application of noise standard BS4142 states that the likely impact of noise from a new development is assessed by reference to the difference between existing noise levels and predicted[xii]. Using this method of assessment the predicted noise still exceeds the absolute limits identified. It has been assumed that this exceedance will be masked by other noise although the existing background noise has been identified as low.

We trust Development Management will require a detailed objective review of this information by a suitably qualified EHO to ensure the appropriateness of the assessment methodology and conclusions.

9. Water consumption/potential contamination

In the absence of an MMP the potential for water pollution from manure spreading has not yet been considered

The ES is required to address '*the use of natural resources in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources':* EIA (Wales) Regs 2017 Sch 4 'Information for inclusion in environmental statements' para (5)(b).

The newly published report from the UN Office for Disaster Risk Reduction[xiii] highlights the increased global risk of drought and the necessity to take urgent action on water and land management. While Wales is a relatively wet part of the UK weather patterns are changing and longer dry spells appear to be more frequent. Increased supplies of water from Wales to England are under consideration. In the existing state of Climate Change emergency, declared by both the Welsh Government and Powys County Council, we do not believe it is acceptable for an Environmental Statement and statutory assessments of the ES to ignore impacts on water consumption.

Poultry sheds consume considerable amounts of water, and ammonia scrubbers substantially increase that consumption. There are already **20** applications approved or within planning within 5km of this proposed development and **32** applications within10km (See Appendix 1). Dwr Cymru have pointed out that this development lies in the Dwr Cymru Welsh Water (DCWW) drinking water catchment 'Wye at Builth' which is designated as a Drinking Water Protected Area under Article 7 of the Water Framework Directive. As such, the protection of both the quantity and quality of groundwater is critical. The LPA cannot approve this development

without appropriate assessment of the risks posed by this development to Drinking Water Protected Area, both in terms of consumption and also potential for ground and surface water pollution.

Assessment of risk to Drinking Water Protected Area required.

10. Transport

It is likely traffic movements will need to be reassessed to reflect export of manure off the farm.

The Transport Report states the advantage of being close to the A470 but no assessment has been made of the potential impacts on the small market town of Rhayader, a popular centre of walking tourism. A substantial number of HGVs associated with this development will have to pass through the narrow streets of Rhayader's town centre which are very unsuited for this type of traffic. We note the Rhayader Community Council concerns about traffic on the St Harmon Road in relation to 18/0463/FUL have recently been uploaded onto the Powys website for 21/0059/FUL. There is no explanation for this but inevitably traffic conditions will have worsened in the meantime.

11. Odour and dust

Odour and dust implications of manure spreading have not been considered.

It's asserted that proposed scrubbers will achieve 90% reduction in dust emissions. In the absence of evidence of % mitigation which can realistically be achieved by scrubbers, likely nuisance from poultry dust can't be quantified.

Odour predictions are presented as averages and so do not address peak odour emissions which will be generated on shed clearing and cleaning. This will happen at least 7.5 times a year, lasting several days on each occasion, potentially constituting a major nuisance for those affected.

Para 2.4 Derivation of Emissions contains assurances that the emissions rates used are precautionary, but this statement can't be checked against comparable installations as the per bird emissions rates are not disclosed.

We are also unable to follow the logic of the statement (page 81 ES) that '*These benchmark limits may be relaxed in cases where the source is familiar to the location. This is the case in relation to intensive agriculture in a rural setting'*, since intensive livestock odours are qualitatively different from other farm smells and the general local experience is that the odours of intensive pig and poultry manures are particularly offensive and enduring.

Reference is made to measures outlined in an Odour Management Plan which is not supplied as part of this

application and cannot be checked or conditioned as part of approval of this application. No weight should be placed on claims relating to this report unless the OMP is submitted to the LPA and its relevant provisions conditioned.

Odour implications of manure spreading and peak odour operations need to be assessed and appropriate reports supplied.

12. Climate change

The ES is required to address *'the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change':* EIA (Wales) Regs 2017 Sch 4 'Information for inclusion in environmental statements' para (5)(f).

We take the opportunity to repeat here comments included in the objection to 20/1226/FUL as the failure to address this issue is incomprehensible, particularly in view of the fact that Powys declared a Climate Change Emergency in September 2020.

PPW 11 refers to climate change throughout and asks, 2.28

- will the causes and impacts of climate change be fully taken into account through location, design, build, operation decommissioning and restoration and
- does it support decarbonisation and the transition to a low carbon economy?

4.1.4. says 'land use and transport must be integrated. The planning system must ensure it enables integration:

- between transport measures and land use planning'

CPRW considers that the council must take climate change into account.

Powys has 80% of the intensive poultry industry in Wales. Powys has approved applications for an estimated 10,000,000 intensively farmed chickens, nearly half of which are in the sensitive catchment of the Wye SAC. NRW has recently announced that two thirds of water bodies in Welsh SACs, including the Wye, are failing phosphate targets.

The intensive poultry industry depends on feed imported from the Americas where production involves large scale habitat destruction and environmentally costly transport. It also uses important water resources. There are serious environmental impacts through use of pesticides and veterinary pharmaceuticals. These and the widely acknowledged risk of human avian flu pandemics are not even considered in planning.

The following statement in the ES fails to address the wider context of this application in accordance with the requirements of PPW.

6.16 Carbon Dioxide *The proposed poultry development will result in very low emissions of carbon monoxide. Most carbon monoxide emissions associated with poultry houses are from the fuel used to heat the buildings. However, the buildings will be heated using biomass boilers utilising a renewable energy source which is encouraged by Government policy. Any carbon dioxide emitted from the poultry development would also be off-set due to the reduction in emissions from transporting poultry meat from elsewhere. Increasing the amount of home produced poultry meat will reduce the need for importing meat from abroad and hence help to reduce the level of transportation required*.

There is no reference here to the dependence of this model of farming on imported feedstocks nor to the widely agreed need for food systems to substantially cut meat production, particularly meat from intensive livestock systems, in order to address climate change and achieve genuine sustainability. Nor does this address the opportunity for carbon sequestration forgone as a result of changing land use both on site and for feedstock production.

12. Cumulative impacts and existing environmental problems

The ES does not address cumulative impacts, nor impacts in relation to existing environmental problems, as required by EIA (Wales) Regs 2017 Sch 4 'Information for inclusion in environmental statements' para (5)(e): *'the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources'.*

Chief Planning Officers have been reminded of this duty in the CPO letter of 12/6/18

- **The above demonstrates very serious defects in the application information supplied and also the absence of critical information including LVIA and Manure Management Plan.**

- **CPRW B&R encourages Powys Planning Department to refuse this application.**

- **We trust that Powys County Council will liaise with NRW in order to clarify responsibilities with respect to safeguarding SACs and other habitats from environmental impacts of intensive poultry farming. We do not believe the current LPA Planning and NRW Environmental Permitting regimes are fit for purpose in achieving this.**

Jonathan Colchester

Chair: Brecon & Radnor Branch
Campaign for the Protection of Rural Wales

brecon-and-radnor-cprw.wales

Attachment: (also reproduced in Appendix 2) Research Briefing: Controversies over intensive poultry unit developments – Dr. Alison Caffyn – Briefing 3. May 2021 Tourism Impacts

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[i] 20/2115/REM | Section 73 application to vary condition 3 of planning approval 20/1115/FUL to allow the building to be used for up to 5,000 free range organic broilers (Poultry) Ffosmascal, Rhayader, Powys, LD6 5NR. See CPRW BR objection to this application which details an issue with double counting fields as available for spreading with manure related to both 18/0463/FUL and 20/2115/REM 'Sustainable' Powys? – Brecon & Radnor Branch of CPRW (brecon-and-radnor-cprw.wales)

[ii] ES 13.7 'All dirty water from washing down will be collected in an appropriate tank located under the yard area. Valves will be provided in the system to prevent dirty water entering the main system. All dirty water collected from washing down after each crop will be collected in tankers and transported and spread on the farmlands.'

[iii] The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 The Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (legislation.gov.uk)

[iv] NRW response dated 19/3/2021 to application 20/1292/FUL Drewern, Hundred House: Erection of a poultry unit extension to accommodate 16,000 free range chickens (egg production) together with associated feed bins and associated works

[v] https://cdn.naturalresources.wales/media/685782/gn021-poultry-units-planning-permission-and-environmental-assessment.pdf

[vi] Natural Resources Wales / Ammonia assessments: initial screening and evidence gathering (GN 020)

[vii] Woodland Trust 'Wood Wise' page 19 'Nitrogen – An Insidious Threat' by Alistair Hotchkiss Woodwise, Evidence for Action, Spring 2021 (woodlandtrust.org.uk)

[viii] These attributes are: diversity, extent, condition, connectivity and adaptability to change. Planning Policy Wales - Edition 11 (gov.wales) (page 138)

[ix] BBC Radio 4 - The Jump - Available now

[x] INTENSIVE POULTRY & PIGS AND THE THREAT OF PANDEMIC – Brecon & Radnor Branch of CPRW (brecon-and-radnor-cprw.wales)

[xi] An Outbreak of Legionnaires Disease Caused by Long-Distance Spread from an Industrial Air Scrubber in Sarpsborg, Norway - Clinical Infectious Diseases, Volume 46, Issue 1, 1 January 2008, Pages 61–69, Outbreak of Legionnaires Disease Caused by Long-Distance Spread from an Industrial Air Scrubber in Sarpsborg, Norway | Clinical Infectious Diseases | Oxford Academic (oup.com)

[xii] The industrial noise assessment method in BS 4142 is based on the difference between the measured 'background sound level' without the influence of any industrial noise source, and the 'rating level' of the industrial source, at the receiver location. BS4142:2014

states: “The significance of sound of an industrial and/or commercial nature depends upon both the margin by which the rating level of the specific sound source exceeds the background sound level and the context in which the sound occurs”. An estimation of the impact of the specific sound can be obtained by the difference of the rating sound level and the background sound level and considering the following:

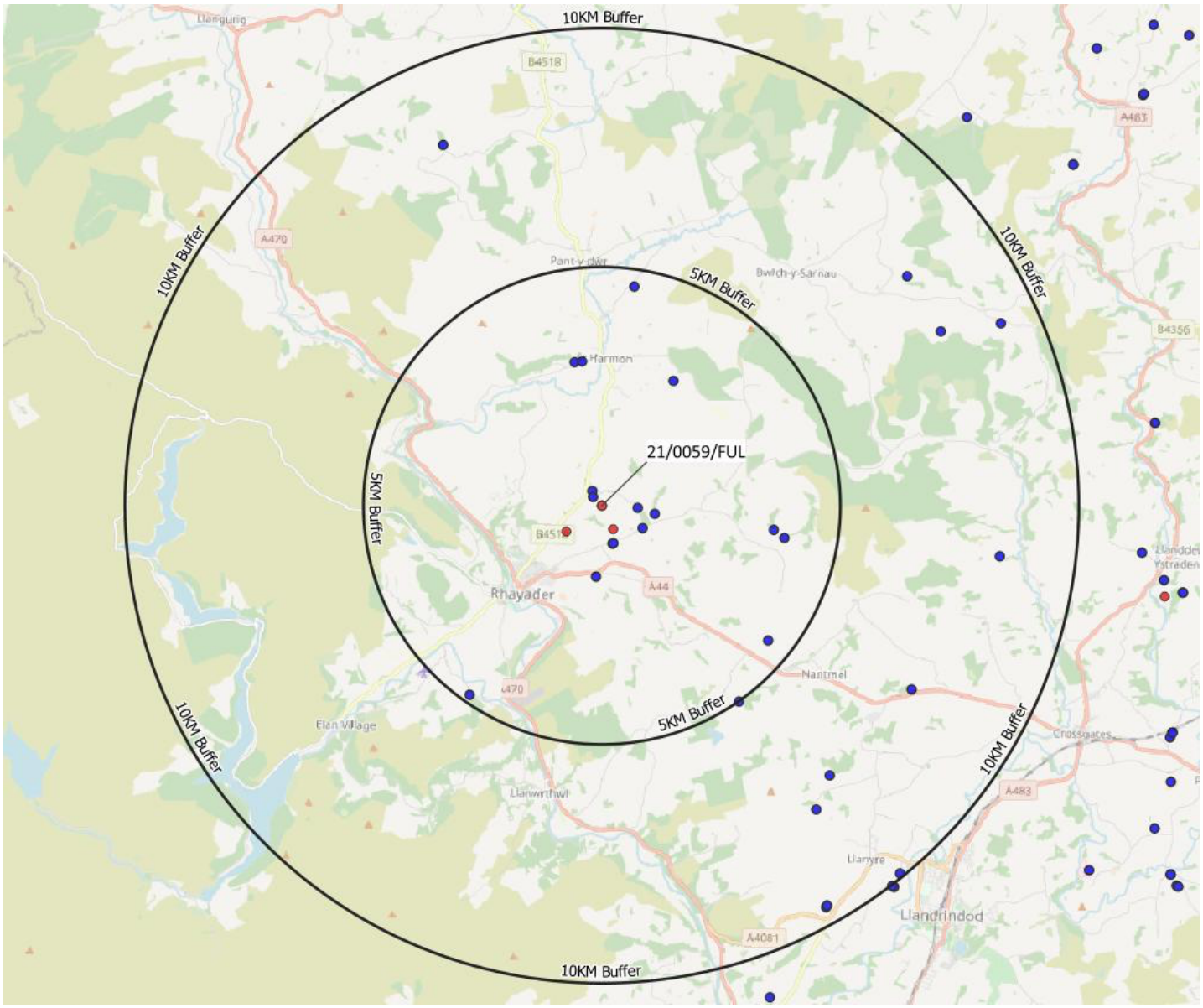
- “Typically, the greater this difference, the greater the magnitude of the impact.”
- “A difference of around +10dB or more is likely to be an indication of a significant adverse impact, depending on the context.”
- “A difference of around +5dB is likely to be an indication of an adverse impact, depending on the context.”

Extract from ‘*BS4142 Noise Survey & Assessment: A Practical Guide to BS4142 Noise Assessments and Planning Permission’* (Posted in Acoustic Consultants News, Featured on Jan 09, 2020) BS4142 Noise Survey & Assessment | A Practical Guide | Nova Acoustics

[xiii] GAR Special Report on Drought 2021 | UNDRR

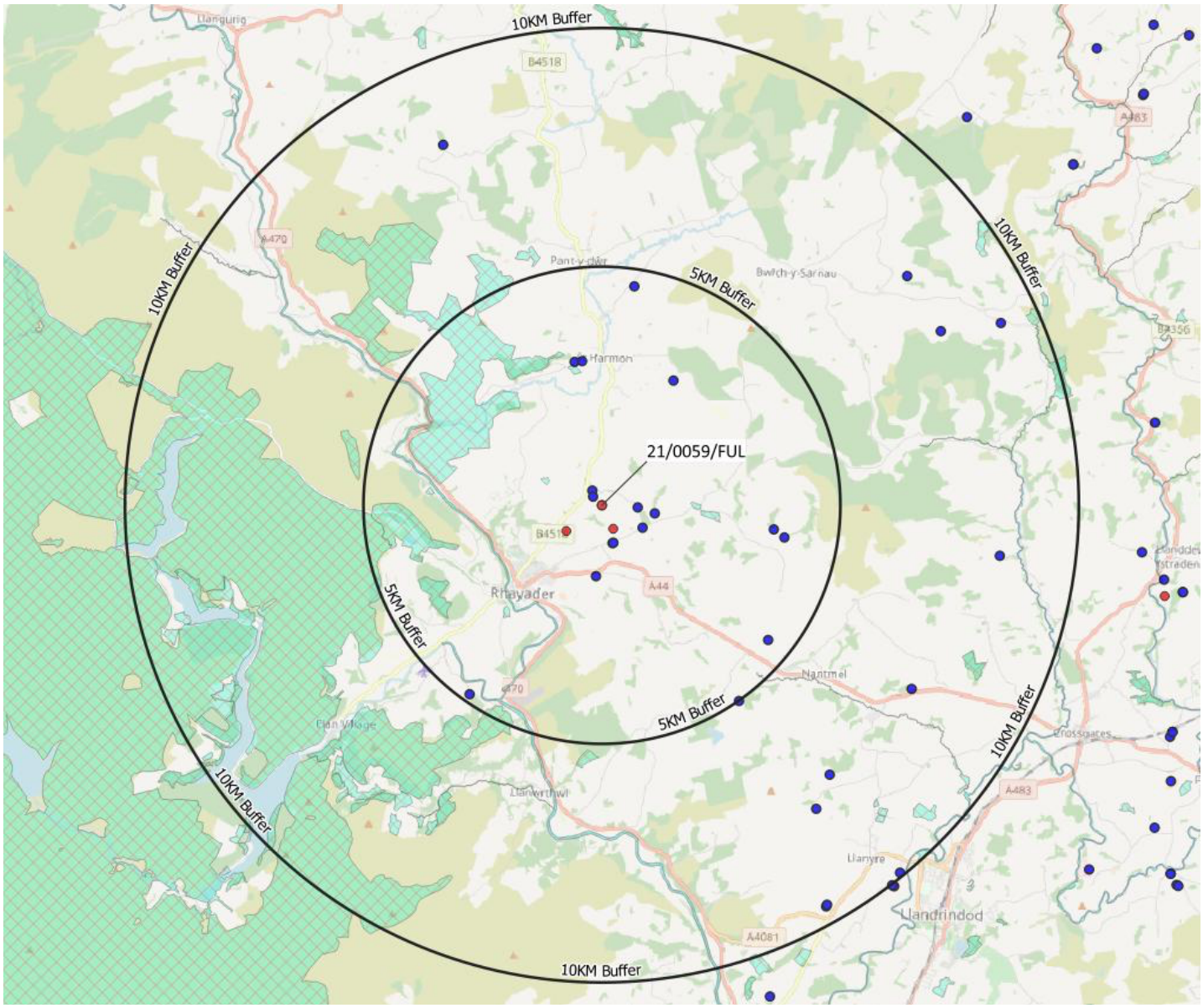
APPENDIX 1

APPROVED (BLUE) AND IN-PLANNING (RED) INTENSIVE POULTRY APPLICATIONS WITHIN 5KM AND 10KM OF THE APPLICATION (SOME CIRCLES REPRESENT MORE THAN ONE APPLICATION)



APPENDIX 2

APPROVED (BLUE) AND IN-PLANNING (RED) INTENSIVE POULTRY UNITS AND EUROPEAN DESIGNATED SITES WITHIN 5KM AND 10KM OF THE APPLICATION



CARDIFF UNIVERSITY
PRIFYSGOL CAERDYDD

Research briefing

Controversies over intensive poultry unit developments - Dr Alison Caffyn – Briefing 3. May 2021 – Tourism impacts

Introduction

In my research into the controversies over planning applications for intensive poultry units (IPUs) across Herefordshire and Shropshire, the potential negative impacts on the local tourism industry were one of the main concerns expressed by objectors.

> *'(Location) is popular with walkers, ramblers and tourists and the proposal creates a clear conflict with existing tourism businesses in the area. Who will want to sit in the local pub gardens on a warm summer's day with the smell of intensively farmed chickens wafting above their locally brewed ale?'*

However, I also heard again and again that there was no evidence that intensive agriculture could harm rural tourism, recreation and the wider visitor economy. The farming sector dismissed the idea that visitors would notice chicken sheds or be bothered about their presence. In contrast tourism businesses expressed real concern that their nature loving visitors who love walking in the countryside and are seeking a tranquil rural escape could be impacted in numerous ways. Planning officers, caught between the polarised views, wanted evidence to prove whether the impacts were real or not.

Research briefing 1 presented an overview of the research[1] and the proliferation of IPUs across the area. Briefing 2 focused on issues around odour from IPUs. This third briefing explores the question of tourism impacts from intensive agriculture.


INDEPENDENT

News · UK · Home News

Herefordshire's idyllic Golden Valley threatened by plans to build huge broiler-chicken sheds

Local residents say units would create noise, smell and pollution

Previous research[2] has found that predictions that visitors will be concerned about wind farms or fish farms in a destination are not always borne out in reality. Some visitors like seeing green energy schemes or don't mind some infrastructure in a landscape. So what do visitors feel about intensive livestock agriculture?

Research methods

The research methods used (detailed in previous briefings) included analysing planning documents, media reports, interviews with a range of farming, planning, community and business actors. I interviewed representatives of tourism bodies, plus tourism businesses and also more than one farmer who also has a tourism operation. My walking interviews included several with people from the tourism or walking sector. I also conducted two pilot surveys focused in NW Herefordshire in 2018 (not written up in my thesis due to lack of space).

The tourism business survey conducted through email secured a response from one third of tourism operators in the area targeted (50 in total). A similar number of responses was received from the visitor survey which used a postcard to direct visitors to respond to the online survey. This briefing focuses on Herefordshire but many of the issues also apply to Shropshire.

Tourism concerns

The analysis of planning documents identified tourism as one of the top concerns voiced by objectors to planning applications. Local people perceived that the combination of unpleasant smell, heavy goods traffic, visual impacts, noise, water and air pollution (the other top concerns) was likely to affect people visiting the area. A local councillor said:

> *'I mean a sort of logic does tell you that if you've got an extremely smelly business, chicken houses or anything of that sort*

nearby, it's not going to exactly help. That seems pretty obvious really.'

A typical comment was:

> *'We're shooting ourselves in the foot – Herefordshire should be a landscape rich with agriculture, natural history and food and they're heading for an industrial agricultural vision instead. Yes it will affect the image of county – industrial chicken isn't what people want to come and see.'*

This was an environmental officer who describing the poultry odours they could smell during their half hour drive to work each day added: *'Tourists don't want to smell that.*'

Planning perspectives on tourism impacts

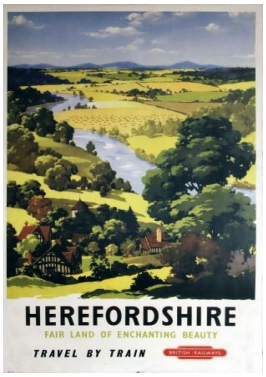
When IPU applications came to the planning committee some planning officers rolled tourism concerns up into general impacts on the local community and gave them no additional consideration. There was no assessment of tourism businesses in the locality and whether they might be impacted. This was in contrast to the considerable weight given to the positive economic impacts the IPUs were forecast to bring. Other planning officers said they felt tourism was a legitimate concern, but without firm, scientific evidence they would not be able to defend such an argument. They knew they might end up at a planning appeal having to defend their recommendations.

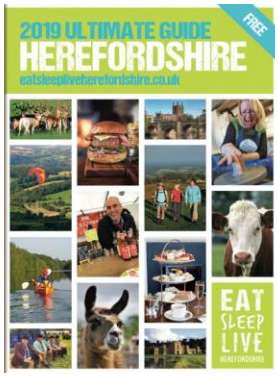
In addition, little attention is given to the impact of IPUs on recreational walkers using local rights of way. The planning process should assess the impact on the 'amenity' of a right of way and yet there is no evidence of this having been addressed except in one or two cases in particularly scenic landscapes. As long the actual route of the path is not affected the impacts on rights of way and walkers are largely ignored.

Objectors had identified that there was a potential economic counter-argument that rather than boosting the local economy such intensive production could be gradually doing significant harm to the economy by damaging tourism and recreation. But this argument was not being heard. Officers said they would need examples of specific financial losses or visitor reviews specifying problems from the IPUs. Instead, the only example of tourism-specific evidence given much consideration was a letter written by a poultry farmer denying the impacts of IPUs on their own tourism business, used to support another IPU application. Some farming sector interviewees accused objectors of using tourism arguments spuriously.

Visitor perceptions of Herefordshire

Herefordshire has been a popular rural destination for visitors for centuries. It is promoted for its quintessential English landscape, the outdoor recreation activities this provides and also for the food, drink and traditional agriculture the area is famous for (see old and more recent promotional imagery below).





Tourism is economically more significant to the county in terms of income and employment than agriculture[3]. The sector is dominated by small companies: there are very few large hotels or chain businesses. The county is very dependent on repeat visits from people who appreciate the peace, rurality, heritage and slow pace of life.

Hereford has been promoted as 'the rural city'. Villages are known for the black and white timbered buildings. One respondent to the visitor survey said *'It's like stepping back into time'*. When asked what they associate with Herefordshire visitors mentioned the countryside and many local crops and landscape features (see word cloud below).

The rural nature of tourism and imagery of a traditional farming landscape and community is partly why intensive farming is a shock when encountered in reality.

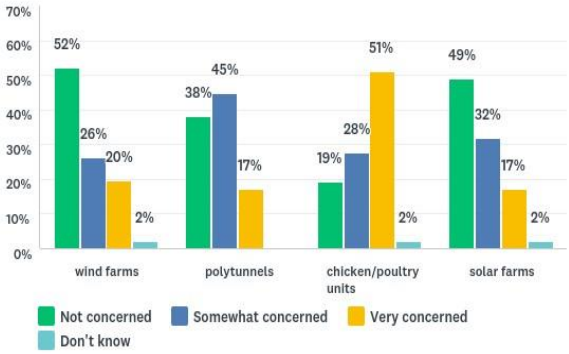
Typical visitors tend to be:

- Older couples
- Families (in holiday periods)
- Some younger outdoor activity markets e.g. mountain biking

Farm tourism has declined in Herefordshire. There are now relatively few farm based B&Bs or campsites. Some farms rent out holiday cottages or have large converted barns where groups may stay.

Tourism business survey findings

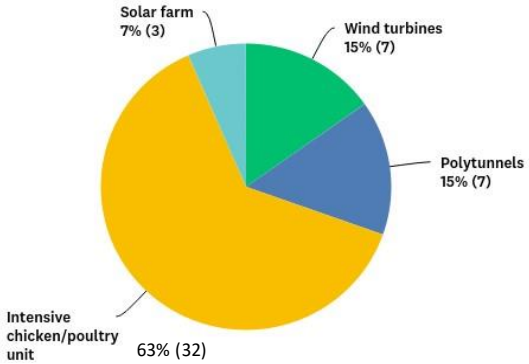
The business survey revealed significant concern about IPUs. I first asked businesses about a range of large scale rural developments that have caused concern in the area. The graph shows that far more people were concerned about poultry units than polytunnels, wind farms or solar farms.



To what extent are you concerned or worried about the potential negative impacts the following types of development in the local area would have on your business and visitors?

I then asked what aspects of each type of development concerned the respondents and found water pollution, smell, traffic and landscape impacts caused most worry. There were also concerns about light and noise pollution, dust and flies, impacts on rights of way and how intensive animal rearing was at odds with the green image of the county.

When asked which type of development they would least like to have built near their business, poultry units were clearly the most worrying (see pie chart).



When I then asked more specifically about existing poultry units typical comments from tourism businesses were:

> *'Terrible smell permeates Kington when they are cleaning them out. Unsightly sheds. Not in keeping with the traditional, rural nature of Herefordshire. Just knowing that they are there is horrible!'*
>
> *'Disappointment, bewilderment that such a beautiful part of the world could be vandalised in such a way.'*

The survey went further asking a hypothetical question about whether they thought their turnover would be likely to be impacted if a new poultry unit were to be built within a mile of their business. There was a fairly even split between those saying yes and no to this question and a wide range of further comments were made:

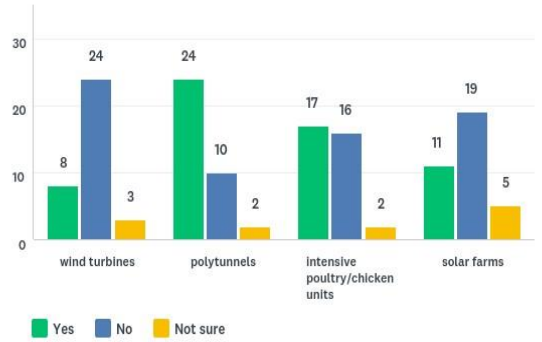
> *'For repeat visitors - they won't know the first time, but will put them off - particularly smell, dealing with manure & increased traffic on the roads'*
>
> *'One negative comment on tripadvisor or other review site regarding the smell or ugliness of the unit would be instant death to our business'*
>
> *'People are attracted to our B&B because of the peace and quiet and good views. Such a development would not be conducive to that image. Also, we serve good local produce - including only free range eggs - which is counter to the image intensive poultry represents.'*

Repeat business was seen as most vulnerable. There were also criticisms of local authorities, bemoaning how tourism businesses don't get the same sort of support as agricultural ones. One pub landlord compared the fact that farmers don't pay business rates on IPUs with the recent increase in business rates for their pub business.

Visitor survey results

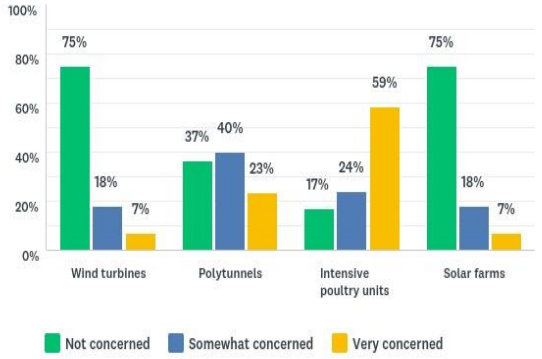
Visitors are key actors in the situation but it's very challenging to hear their voices about an issue like IPUs, which was why I trialed the visitor survey. I could email the businesses direct but with the visitors I used postcards (with a prize incentive) which people picked up at local attractions. The 50 responses to this survey was just a small snapshot from the total visitors that year. The characteristics of the sample are similar to the typical visitor profile from previous surveys, which provides some confidence in the results. However it should be borne in mind that the type of visitor picking up the survey postcards and bothering to respond online may have a stronger interest in landscape issues which were flagged on the postcard/online invitation. But as this is the first time such an exercise has been attempted it is interesting to see what data was produced.

Many farming sector interviewees had said they didn't think visitors would notice chicken sheds. However, half had noticed poultry units (graph below), which given they are not as distinctive as turbines, polytunnels or solar panels is interesting.



Have you noticed any of the following developments?

In terms of levels of concern (graph below) there is a clear picture with wind turbines and solar farms not causing much concern - only 25% of respondents. In contrast 63% of people are concerned about polytunnels and for chicken units the figure is 83% with 59% very concerned.



I had wondered whether businesses anticipate their visitors will be more worried than the reality (as has been shown in some studies on wind farms) but these results suggest that visitors do notice and are as concerned about IPUs as the tourism businesses believe.

When asked what factors about the developments concerned them visitors specified landscape, traffic, smell and economic aspects:

> *'These industrial scale production units belong on industrial estates - not in a rural landscape'*
>
> *'They interrupt the bucolic landscape. Density and intensity matter'*
>
> *'Worried about intensive farming and its effect on small local businesses'*
>
> *'Landscape affected, but biggest issue is trucks/HGVs in small villages'*
>
> *'Smell alerts you to unethical poultry production'*

I asked the visitors a hypothetical question about their response if they were to find an IPU close to their accommodation. 80% said they would be concerned and gave a range of responses:

- upset
- disappointed
- would not return
- would complain
- would ask for refund
- would leave negative online review

The picture that emerged from the visitor survey is of reasonable levels of awareness. This may have been skewed by the nature of the sample, but equally the type of people who visit rural Herefordshire are most likely to value deeply rural areas. They visit regularly and therefore notice change. Some might not go back to a particular place if they feel it is spoiled for them and that could in time mean they don't return to Herefordshire. There is certainly much in the survey that would worry tourism businesses located close to poultry units or proposed units:

Interview results

I interviewed a similar number of people from the tourism sector as the farming sector (14 in each) with two people being in both groups. The interviews helped tease out some of the survey findings. The farming sector denied intensive poultry units would impact tourism or that visitors would notice or care about IPUs:

- Visitors don't know what chicken sheds even look like

- Visitors are transient so it doesn't matter whether they are affected
- Walkers won't be affected walking through an IPU site – it's just a tidy concrete yard
- Visitors won't be put off coming to Herefordshire because of agricultural infrastructure

In contrast, most tourism actors were clear about potential negative economic impacts on tourism. They felt that the most likely impact would be that visitors would simply decide not to return. It might not even be a conscious decision, but that when thinking about where to go in future Herefordshire/Shropshire simply wouldn't be so high up on the list of options next time.

- Smell will be the most pervasive impact on visitors, especially for outdoor tourism operations and for holiday accommodation.
- Visitors will be affected when they see multiple sites across the area, if they can hear IPUs at night or if they encounter chicken lorries on rural lanes.
- The type of discerning visitors who come to Herefordshire and Shropshire are exactly those who will notice and care

Some businesses were concerned about other risks such as bird flu. There were also some indications that specific businesses close to new IPUs had considered selling up. One caravan/campsite owner said they'd been badly affected:

> *'We get smells and can hear the fans on at night when the wind is in our direction which is most of the time. The biggest impact is FLIES. It is horrendous, people on the site complaining constantly (…) I keep lying and tell them it's a bad year for flies and we are in the country. I fear a lot won't return because of flies.'*

They had thought about selling their business.

Why are tourism impacts denied or dismissed?

The research has begun to find evidence of impacts on tourism but why is so little heard about this, meaning it is difficult to evidence in planning applications? I identified three particular factors:

1. **Silence of visitors** – many visitors are reluctant to complain, for example, about unpleasant IPU smells. Complaining spoils the experience for many, they probably know their hosts aren't responsible and nothing can be done, and they fear looking like stupid urbanites. So they don't say much about what they experience and are more likely to simply vote with their feet and not return.
2. **Silence of tourism businesses** – there is considerable fear from the tourism sector of poor online reviews mentioning IPU impacts and the potential for this to put future visitors off. As one objector put it, voicing their fears for the tourist trade in their local area: '*Bad news travels fast, especially on social media or Tripadvisor'.* Another said:

   > *'It's a bit difficult for me. I could have gone out to my 14,000 followers on twitter and started making a fuss about it but at the same time, I don't want to draw attention to the fact because I want to attract people to come here..'*

3. **Lack of voice for tourism** – the tourism trade organisations have become very weak with few staff or resources and are reluctant to take on an issue such as intensive farming, which could backfire on them.

   > *'Agriculture has a massive voice, doesn't it? Tourism's much better economically. It brings more income into the area, so you'd think that… It surprises me on a daily basis how it's ignored. … Yes, it is; tourism is just so ignored. Why is it ignored?*

There is a lack of institutional support for tourism. Local authorities had cut support for tourism to save money. While some local tourism groups remain, they are too small, busy and fragmented to speak up about controversial issues such as intensive farming. Tourism was said to be a priority by the Local Enterprise Partnership but it had done little recently for the sector:

> *'It's like banging your head against a brick wall to be totally honest. We have very little contact. … Anything visitor related, tourism, we just struggle to get any engagement.'*[4]

In fact, the few spokespeople for tourism also had farming interests. Either by design or default the voices that speak for tourism in Herefordshire tend to be farming voices. And these voices will not speak out against intensive livestock farming.

Farming and poultry interests have occupied space in the remaining tourism bodies and environmental organisations. They have sponsored food and tourism events and police the discussion at most rural type bodies and forums. They also dominate planning committees.

Conclusions

The research has broken new ground by gathering views from businesses and visitors about this challenging topic. I found evidence that IPUs are beginning to impact tourism in the area. The evidence may be fragmentary, but suggests that the types of people who visit the area do care about intensive farming, many do notice the proliferating IPUs and their experiences are affected to some extent. The impacts are likely to be gradual with regular visitors deciding not to return and therefore the effects are difficult to prove.

IPUs are unlike wind or fish farms[5] where visitors' views are mixed and relatively mild. IPUs generate noxious smells, more traffic, have no green credentials and involve animal suffering and are therefore a different case.

The dynamics around tourism means that evidence of harm is difficult to capture. Complaints may not be voiced and businesses are reluctant to raise awareness of the issue for fear of damaging their own business. Farming voices dominate networks where the issues might be discussed and suppress or dismiss criticism. Some tourism voices are actually farming voices – they deny and normalise intensive livestock industry impacts.

Power relations may be starting to shift, particularly as awareness of the poultry industry's contribution to river pollution has grown. Campaigners have successfully challenged more IPU planning applications in recent years. However the argument about tourism impacts is likely to continue until more people are willing to share their experiences and more research is done to unearth the gradual effects.

Recommendations

- Local authorities should require a detailed economic impact assessment for IPU planning applications which should identify businesses likely to be negatively affected and jobs at risk as well as predicted positive economic impacts.
- Concerns of local businesses should be given more weight. Recognition should be given to the fragmentary nature of the local tourism sector and that businesses may be small but collectively generate more income and support more households in rural areas than farming.
- Planners should require an assessment of the impact of a proposed IPU on walkers and the amenity of rights of way.
- More weight should be given not only to local people's quality of life, including their recreational use of local countryside but also to visitors staying in holiday accommodation, including nearby campsites.
- There should be greater clarity about what information is not available and how the limited evidence about tourism impacts does not mean they are not building gradually.
- More research should be carried out into the impacts of recently built IPUs on nearby tourism businesses and into visitor attitudes and concerns about landscape, amenity and intensive farming.

Further research briefings and information

This is the third in a series of briefings on various aspects of the research. Each briefing links to an academic journal article being published in tandem.

My article published in the journal *Land Use Policy* 2021 Broiler battles: contested intensive poultry unit developments in a policy void. Summarises the pattern and timing of the proliferation of IPUs across Herefordshire and Shropshire.

Please get in touch if you would like more information on any aspects of the research or would like to discuss future research opportunities:

alison.caffyn@gmail.com

[1] Caffyn, A. 2020 Creating a stink, Cardiff University PhD thesis, supported by ESRC grant no. C110866K
[2] E.g. Regeneris Consulting 2014 Study into the Potential Economic Impact of Wind Farms and Associated Grid Infrastructure on the Welsh Tourism Sector and Nimmo et al 2011 Does fish farming impact on tourism in Scotland?
[3] Regeneris Consulting 2016 The Marches Strategic Economic Plan Evidence Refresh Report
[4] During 2020/21 much more investment was directed to Herefordshire tourism during the COVID pandemic.
[5] Views about fish farms have probably become more negative in recent years with their proliferation and greater awareness of negative impacts on the fish and environments.