

## To members of the Environment and Sustainability Committee

Copy Ms K Williams, AM

Dear Committee member,

### Poultry Units and Pollution of the River Wye

I was very interested to read the draft transcript of the Environment and Sustainability Committee on 10 June, and to note the discussions around pollution by poultry units.

For the last 17 months, we have been objecting to a proposed broiler unit in St Harmon, Rhayader which would be on the bank of a tributary of the Wye. Our researches have extended beyond the planning application such that we have a good understanding of the planning and permitting process under the IPPC regulations.

We are particularly concerned about pollution of the Wye from the proposed broiler unit at St Harmon, and have been supported by:

- Radnorshire Wildlife Trust (2 representations)
- Wye and Usk Foundation (2 representations)
- Professor Ormerod, Cardiff University
- River Wye Gillies Association
- Wildlife Trusts Wales, who used St Harmon and The Circuit of Wales as the only two attachments to the 26-page critical evidence submitted to the Welsh Government's annual scrutiny of NRW in April 2015.

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During these 17 months we have accumulated a wealth of evidence and have commissioned reports for the proposed broiler unit at St Harmon from both Coventry University and Thomas Consulting; both advising that [“The drainage system clearly offers no treatment facility whatsoever”](#). Thomas also advises that [“flood risk downstream will increase.”](#)

Even the planning application states that the plan will only [“reduce the risk of any contaminated water entering the stormwater drainage system”](#). NRW's Field Officer has confirmed that there is some risk.

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Apparently Powys CC has no Enforcement Officer and no-one responsible for the Water Framework Directive, their remaining Ecologist left in April this year (without replacement so far).

It is a huge concern that NRW precedes its recommendations with “No Objection” when it is quite apparent that this statement is taken at face value without due consideration of NRW's recommendations and, in our view, is therefore misleading.

We are aware of 139 planning consents for poultry units in Powys since 01.01.08. Most of these are below 40,000 birds and do not require an IPPC permit or regulatory control. Many more are expected across Powys and the Borders.

Poultry planning applications have a near 100% success; IPPC permit applications to NRW have had a 100% success rate since 2008. Of the 14 poultry planning consents in Powys in 2014, NRW's conditions were omitted from 4 consents. Powys did not wait for comments from NRW for 2 of these consents, and from its ecologist for 6 of these consents. This questions whether the applications are given adequate scrutiny.

Planning applications and permit applications need not have the same content. I have reviewed four instances where Powys planning has based its assessment of pollution on less birds than the permit application, eg planning 38,000, whereas permit 64,000 birds.

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Our researches support the draft comments in the transcript of the Environment and Sustainability Committee that:

- Siting poultry units near watercourses is a serious problem;
- Pollution may result when the units are being cleaned out and jet washed;
- Poultry units are an increasing source of pollution;
- Inefficient constraints are placed on the management of these units;
- They're far too near watercourses (these large industrial units are often sited in the valley bottom – of necessity adjacent to a watercourse);
- I haven't seen the enforcement of existing regulations;
- Insufficient constraints are placed on the management of these units;
- Planners have taken a view that this is a matter for NRW and NRW have probably taken the view that it's a matter for the planners;
- NRW and Powys are not prepared for this huge surge in this business;
- There's a danger that NRW leave it to the planners and the planners leave it to NRW;
- The local planners can ignore what we (NRW) have said;
- There is a potential risk because of the cumulative effect that, collectively, those sites could pose a risk to water quality.

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Dr Marsh-Smith did mention acidification (paragraph 31), its impact on the rivers and its control by artificial liming.

Poultry units emit ammonia which is deposited as nitrogen and acid some distance away from the source unit. Not only is this air pollution impacting the river network, but it is also having a significant effect on plants in protected sites, especially when the all-important cumulative impacts are considered. Arguably, this situation is **even more serious** than pollution of the river network.

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The interaction between the various disciplines and organisations provides a complex scenario under two different legislations. No-one has overall responsibility.

Please note our major concerns about poultry unit planning and IPPC permitting procedures when considering your report, and ask if you would like any further information or documents.

Alan Loveridge