Objection to the Granting of permits for the expansion of Llanshay Farm, Neuadd Isaf Poultry Farm and Rhosddu Farm

Permit Nos: EPR/AB3593ZL, EPR/HP3836MG, EPR/AB3095HL

Given the current state of the rivers Wye and Severn and their tributaries, it seems extraordinary that NRW are 'minded to permit' any further expansion of IPUs in these catchments. Such a decision suggests a massive level of institutional failure by the body charged with the protection of the environment in Wales as it fails to address critical issues pertinent to NRW's statutory duties under the Well-Being of Future Generations (Wales) Act 2015 and the Environment (Wales) Act 2016.

In particular, IPUs that are reliant on fossil fuels and deforestation cannot be described as meeting the conditions in the Well-Being of Future Generations (Wales) Act. Deforestation in areas like the Amazon, destabilises the global climate, which is a significant cause of environmental harm to us now and to future generations. Permitting such development is inconsistent with NRWs purpose of pursuing the sustainable management of natural resources.

Recent legal judgement has clearly defined chicken manure as 'waste'. Therefore by definition, any increase in the number of IPUs goes against the Welsh Government's net zero waste goals.

In its current form NRW's permit system fails to support Welsh Government policy and commitments. The significant harm to ecosystems caused by the intensive poultry industry is fully understood and well proven (see references below). If NRW grants permits to support the increase of this industry it is causing significant damage to ecosystems. Any such decision risks the lives and health of future generations and is a direct contravention of the Well-Being of Future Generations (Wales) Act 2015 which NRW is bound by.

I hereby object in the strongest possible terms to the granting of these three permits (at Llanshay Farm, Neuadd Isaf Poultry Farm and Rhosddu Farm on the grounds that:

1. Any such permit fails to include or consider the impact of waste products from the site once they leave the site. Therefore the proposed permit does not provide "a high level of protection" as NRW claim.
2. The permit is limited to the site boundaries and therefore does not consider the full impacts of the development to air, water, land and any ecological receptors from the proposed activities as required.

3. NRW Environmental Management System (EMS) guidance are not fit for purpose because they do not protect the environment or deal with the impacts of the permitted development off site, therefore making it impossible for NRW to meet its statutory requirements for the prevention significant damage to ecosystems.
4. No ecological survey of the extension site at Llanshay Farm has been carried out, there is no determination of badger or other protected species presence, ancient trees or bat roost presence.
5. The impact of the Llanshay Farm site on River Teme, Gwernaffel Dingle and Brampton Bryan Park SSSI (Appendix 4) is not available for public scrutiny.
6. NRW include only Nature Conservation Sites designated as of National Importance. The impact of this development on Local Nature Reserves is omitted.
7. The Intensive Poultry farm EPR permit application is limited to the assessment of any potential impact on the integrity of a European Site (i.e. SAC, SPA, Ramsar) represents a failure of NRWs statutory duty to prevent damage to locally important ecosystems.
8. The pollution from the contaminated 'wash-down' water from the new buildings (that contains antibiotics, chicken litter, and biocides) causes significant damage to ecosystems where it is spread.
9. Odour: - Due to the doubling of the number of chickens at Llanshay Farm there will be a doubling of the actual odour on site to an unacceptable level.
10. Noise; - that the measures proposed for the site are insufficient to prevent disturbance and noise pollution. Specifically that noise from working operations should cease at 5pm, not 11pm!, to prevent impact on neighbouring households. Therefore this development results in an unacceptable level of increased noise pollution.
11. The proposed pest control strategy is inhumane, causes significant harm to local wildlife and ecosystems and does not contribute to the goals of biodiversity restoration committed to by the Welsh government, specifically this proposed permit fails to integrate biodiversity into policy.
12. The permit does not prevent further agricultural pollution from the spreading of chicken manure because compliance with the Water Resources (Control of Agricultural Pollution) (Wales) Regulations 2021 (CoAPR), has clearly failed to prevent devastating pollution of the Wye.
13. Because the applicants Environmental Management System is not available for public scrutiny.
14. There is no determination of the impact of the release of antibiotics from these facilities. These IPUs increase the use of antibiotics in agriculture; this is widely recognized by the NHS, World Health Organisation and others as a major contributor to the clinical problem of antibiotic resistant disease in human medicine.
15. Permitting fails to support the actions commitment by the UK government in the Global Action Plan on antimicrobial resistance, committed to in 2015.
16. Due to persistent residues of antimicrobials found in sediment downstream from IPUs in the Wye valley granting the permit would be in direct opposition to the decision on environmental safety taken by the European Food Safety Authority (EFSA)

17. Any increase in the number of birds requires an increase to the quantity of antibiotics used and therefore an increase in deadly and (due to the resistance caused by intensive poultry farms) untreatable MRSA infections.
18. The proposed permit will cause the deterioration of a protected site (an Ancient woodland located 600m from the proposed development) and local riverine systems from aerial ammonia emissions due to nitrogen deposition leading to nutrification.
19. NRW has failed to address the impact of increased traffic on highway safety, road maintenance costs and harm to local ecosystems.

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