



(Reg. charity no 239899)

The Campaign for the Protection of Rural Wales Montgomeryshire Branch Ymgyrch Diogelu Cymru Wledig Cangen Sir Trefaldwyn

Dear Planning Officer / Planning Committee

Ref: **Erection of a broiler installation and silos, formation of a vehicular access and associated works 19/0938/FUL**

Thank you for the opportunity to comment on this application for 3 agricultural units and associated infrastructure for 150 000 broiler hens at Frochas Farm, Llanerychdol Welshpool.

Having scrutinised the documentation and visited the proposed site, CPRW Montgomeryshire have serious reservations as to the appropriateness of the location for this large application. We also have concerns regarding the standard of the application itself which demonstrates a number of errors and 'oversights' and even appears unclear as to the exact application. We understand some corrections may now have been made but overall have the impression of a less than thorough representation of the impacts.

We do not seek to comment on factors which will be considered in detail by expert bodies but having given due consideration we object to the proposal on the following grounds:

1. Landscape: the LDP is clear regarding the potential for adverse impacts of large agricultural units on our exceptional landscape resource in Powys. Additionally the adopted Landscape SPG provides clear and unequivocal guidance on the methodologies that should be undertaken to demonstrate the impact of an application. These three industrial scale units of 7 200sq.m and 5.5m height, feed hoppers and other infrastructure are proposed in a highly scenic area above Welshpool standing isolated in otherwise undeveloped fields. The situation is prominent and elevated and will greatly detract from the surrounding Montgomeryshire and Shropshire hillsclapes. Units will be clearly visible when approaching from Llanerchydol Park on PRoW; from Glyndwr's Way on the approach into Welshpool (for some considerable distance); from the public highway, and from other surrounding vantage points where this will become the dominant feature. The viewpoints selected by the developer in a minimalistic LVIA carefully avoid any of the more sensitive vantage points and we would recommend that a far more comprehensive analysis be undertaken, for example from the start of the public footpath from the highway at GR: 201082 .

The inevitable considerable earthworks required to produce a relatively flat and accessible site will cause further landscape impact. The proposed planting scheme will provide some limited screening but not from higher land or Glyndwr's Way National Trail.

Should this application be approved then we would request a planning condition that the roofs, walls and feed hoppers are all finished in a dark green material to try and minimise harmful landscape impacts.

2. Siting. The LDP requires new agricultural buildings to be proximate to existing structures, rightly arguing that new buildings should form a visual farm cluster to be understood in the landscape.

The lack of suitable land at Frochas for a development of this magnitude means the units are 300m distant from all existing farm buildings and further separated by the highway. They will not be seen as visual entity with the agricultural business.

3. Setting of Listed Buildings and RHG. Following on from landscape impact is the effect on the setting of the Grade 2* Listed 18th century Gothic Revival Llanerchydol Hall and its Registered Historic Garden. With respect to the RHG and its mature parkland trees, there is the added concern of the damage that may be caused by ammonia and airborne particulate matter, inevitably considerable from a unit of this size. A precautionary principle is required.

There are a number of other Listed buildings in the vicinity including the recently restored early 16th century Old House.

4. Rights of Way . The proposed units are over a well used Right of Way up from Welshpool though Llanerchydol Park and will require a DMO. Although not part of this application process suitable land within the control of the developer will need to be identified. Unless this diversion is a considerable distance from Frochas IPU the ROW will become unpleasant and possibly redundant in use given proximity to these industrial scale units detracting from the otherwise lovely views . Walkers will also experience the unpleasantness of continuous fan noise (only silent when sheds are empty), dust, flies and pervasive odour.

5. Water . The large amount of hard surfacing required and the effect of excavations will inevitably be to increase run off which could have an adverse impact on dwellings in the vicinity. A number of nearby residential properties rely on PWS and this unit proposes to abstract large amounts of water for daily use and periodic cleaning. This could affect water table levels and the possibility of residential water shortages in prolonged dry periods where aquifers are shared. There appears to be no assessment of this factor nor potential pollution of drinking water supplies from run off and this must be addressed.

6. Traffic. Although this appears to be underestimated in the application it is evident that there will be a considerable increase in traffic flow and articulated HGVs given quantity of feed; bird turnover of 7.5 cycles a year; manure and litter clearance every 4 weeks from 100 000 birds ; fallen stock removed every 2-3 days, plus ancillary journeys by vets etc. The access lane is narrow, winding and steep in parts and there will be inevitable conflict with other road users.

7. Muck Spreading: we note with concern that many of the fields identified for manure spreading are on slopes with gradients far in excess of principles for farming as laid out in the Code of Good Agricultural Practice. There are good reasons for these recommendations, principally concerned with run off and drainage, and adherence to them is required.

7. Other businesses. Nearby Dingle Nurseries and Garden is a significant visitor attraction and employer of 70 local people. Increased traffic will be detrimental to road safety without significant highway improvement and modification ; the visitor experience could be adversely impacted by odour and flies and there is potential for damage to the nursery side of the business through increased ammonia and particulates; both of which have been shown as injurious to plant health and metabolism.

We also note with concern that the construction takes no account of the potential for incorporating energy self- sufficiency through the use of solar panels on the roofs or air / ground source heat pumps for heating the units to the high ambient temperature required in broiler units. In combination with the large amount of concrete and the additional HGV movements this development will have an unacceptably high carbon footprint throughout its operational life..

We appreciate your taking these points into consideration.



Jill Kibble
on behalf of CPRW Montgomeryshire Branch.