

There is therefore a presumption against development likely to damage a SSSI. In this instance we have received an objection from Natural Resources Wales who confirm that Gregynog SSSI is already exceeding thresholds and this development, would add further ammonia into that SSSI. It is therefore concluded that this development would further see a decline and negatively impact upon the features of that SSSI and therefore, whilst the agents comments are noted, the reason for refusal remains justified in this instance.

Highway Safety

In Officers previous reports, mention was made to utilising the existing access to the site. This was an error and therefore write to confirm the following updated statement.

Following amended plans, a new access is proposed off C2063 which also includes a number of other highway improvements along the access route and road widening.

As per Officers previous report, the Powys Highway Authority have been consulted and subject to numerous conditions the highway authority has confirmed that they are now in a position to support the proposal subject to the recommended conditions.

Conclusion

In light of the above however, the recommendation remains as per the previous Officers report recommendation.

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Appendix A- Email correspondence from applicants agent.

Dear Sir or Madam,

20/1122/FUL Bank Farm, Aberhafesp

This planning application is before for the committee for determination at the meeting on 5th October 2022. The application was submitted in September 2020, and during that period, the applicant has worked tirelessly with statutory consultees to address the issues arising.

The application has a recommendation of refusal for a single reason which relates to ammonia emissions to Gregynog SSSI.

The application is accompanied by detailed ammonia modelling which shows that the development has a maximum ammonia process contribution of 0.7% to Gregynog SSSI.

This level of ammonia impact was fully compliant with the NRW guidance on ammonia when the application was submitted in September 2020. At the time of submission, the rules were that the process contribution has to be below 1%.

In May 2021, Natural Resources Wales, changed their guidance, and it now requires the development to be below 1%, unless the SSSI is showing to be above its critical load, and if so, their rule is 1% in combination with other plans and projects.

Gregynog SSSI is showing background ammonia levels on the Air Pollution Information System of 1.5 micro grams per metre cubed. The theoretical critical level is 1 micro gram per metre cubed, therefore Gregynog SSSI is above its theoretical critical level (nearly every SSSI in Wales is above the theoretical critical ammonia level).

Our development is below 1%, but there are other projects in the locality of Gregynog SSSI which are pushing the in-combination process contribution above 1% which is why NRW have objected.

This proposal is for a straw-based pig finishing unit, and there are numerous examples of this kind of development across Powys. The proposal is a low-key farm diversification initiative for the applicant, to create an additional income stream for

the business and will be operated by the applicant's daughter Jemma as the next generation of farmer at Bank Farm.

The rules on ammonia set by NRW are a one size fits all approach and is removing consumer choice. This proposal is a high welfare system of straw-based pig rearing – it is not an intensive livestock unit. The production system proposed holds a Compassion in World Farming Good Pig Award.

The problem with NRW's approach is that the threshold levels are so low, this type of high welfare system cannot comply. Typically, intensive livestock units such as broilers or fully slatted slurry-based pigs have lower ammonia impacts than the more extensive systems, such as straw based pig rearing.

Ammonia mitigation in the form of air scrubbers or heat exchange systems can be fitted to intensive livestock units such as broilers, layers or intensive pig units to reduce ammonia, but not to this type of operation.

This project is not an intensive livestock unit, and air scrubbers etc cannot be applied without completely redesigning the proposal as a slurry based intensive pig unit. If the applicant was to do this, it would change the nature of the project from high welfare to intensive, and would overcome the ammonia issue, but the ultimate supermarket customer would withdraw the contract offer, as the production system would no longer fit with their high welfare premium product.

It needs to be borne in mind that ammonia is an inevitable consequence of the production of food. The only way to have no atmospheric ammonia is to produce no food.

The UK is far from self-sufficient in pork, with AHDB estimating that we produce 60% of what we consume, with 40% imported. There is a clear argument that the UK currently isn't carrying its fair share of agricultural ammonia emissions.

Planning decisions should be made with a balance and planning policies should be subject to consultation. This is not what happens with Natural Resources Wales and their ammonia guidance – it is written behind closed doors and issued as law.

We have got to a situation in Wales now that essentially nothing can comply with the ammonia rules, and this is extremely damaging to food security and the rural economy.

Whilst I agree that there is a need to protect biodiversity, there is also an economic need for jobs and food production. There needs to be a political balance between the needs of agriculture and the need to protect the environment and the current rules offer no balance at all. The environment wins with farmers and food security losing.

We can work with a 1% alone allowance for ammonia, but 1% in combination is unworkable for the entire farming industry of Wales.

I would therefore ask that the planning committee consider applying a planning balance to this application, giving greater weight to the need to produce food and have a vibrant rural economy in approving this application. At 0.7% ammonia process contribution, the ammonia impacts on this application are essentially negligible in any event.

Kind Regards