

Partnership Meeting

[Post meeting] Supplement B to the agenda for

Wye Catchment Nutrient Management Board

Wednesday 22 October 2025

2.00 pm

Conference Room 1 - Herefordshire Council, Plough Lane Offices, Hereford, HR4 0LE

	Pages
4. QUESTIONS FROM MEMBERS OF THE PUBLIC Updates received from local authorities and statutory agencies.	3 - 8

Questions received for the 16 July 2025 meeting

Questioner: Tom Tibbits, Chair, Friends of the Upper Wye

This is a question for the statutory planning authorities that operate in the catchment: (Herefordshire, Powys, Monmouthshire etc) For intensive livestock farming developments that are exempt from Environmental permitting regulations (for example poultry units with fewer than 40,000 incarcerated birds), how do the planning authorities keep records about, and assess, the cumulative impacts of pollution from these developments within their own statutory areas? Are these records and assessments available for public inspection?

How do planning authorities keep records and assess the cumulative impacts from intensive livestock farming developments across the entire catchment, for example, how does Herefordshire assess the cumulative impact from any pollution arising further upstream, in this instance in Powys? How does Monmouthshire do the same for both Herefordshire and Powys, and so on? Please detail information for all impacts, ie both airborne and waterborne pollution.

Response from Bannau Brycheiniog National Park Authority

Date: 19/11/2025 Officer responding: Emma Guy (Planning Ecologist)

There are six known sites within the BBNPA area that have been subject to ILU applications within the last few decades; the most recent application was received in 2014 and approved in 2015. No sites are located within the River Wye SAC catchment. Information relating to ammonia emissions and manure management for applications was provided based on the relevant (less stringent) guidance and advice in place at the time, meaning that cumulative assessments would not have been required. The application details are available on the BBNPA planning portal (<https://planningonline.beacons-npa.gov.uk/online-applications/?lang=EN>) and the planning files for all applications are available for public inspection (email: planning.enquiries@beacons-npa.gov.uk). Please note there is no requirement for LPAs to maintain a separate register of ILU applications.

Response from Forest of Dean District Council

Date: [insert date] Officer responding: [insert name and title]

[Response text]

Response from Herefordshire Council

Date: [insert date] Officer responding: [insert name and title]

[Response text]
Response from Monmouthshire County Council Date: [insert date] Officer responding: [insert name and title] [Response text]
Response from Powys County Council Date: [insert date] Officer responding: [insert name and title] [Response text]

Questions received for the 22 October 2025 meeting

Questioner: Dr Christine Hugh-Jones, Trustee CPRW and Secretary of Brecon and Radnor Branch

Please can NRW, NE, and the Wye Catchment LPAs in England and Wales explain how their policies and decision-making about IPUs ensures no further deterioration in the Wye Catchment waterbodies.

Please would the NMB consider this and organise a response.

Future poultry numbers and the nutrient output of intensively reared poultry in the Wye catchment, and where this ends up, is fundamental to the NMP.

The LPA approves planning applications for IPUs and NRW/NE grant permits for those IPUs with numbers over the Permitting threshold.

Applications reduced to a trickle over the last few years but are now accelerating again with:

- plans for expanded shed capacity to meet the Better Chicken Commitment and changes from turkey rearing to chicken rearing.
- extra bird numbers justified on grounds of “betterment” through the addition of ammonia scrubbers or advanced heating systems or changes in standard official coefficients.

At the last NMB Meeting, Ann Weedy reported that NRW had announced it was resuming the determination of permits for new or expanded IPU's under Environmental Permitting Regulations (EPR) and these permits did not include the topic of manure management. NRW also acts as Statutory consultee to Wye Catchment LPAs in Wales as does the EA in England.

We do not know NRW's policy as Statutory Consultee in advising LPAs about the conditioning and monitoring of manure management plans, about the fate of exported nutrients and about ensuring these do not pose a risk to rivers in the Wye catchment or elsewhere. Nor do we know the corresponding policies for the EA in Permitting or in advising LPAs about Planning assessments.

We do not know the various LPA's positions on planning determinations.

In Wales, for the past two years, almost all IPU applications have been under consideration by the Welsh Government for call-in and are mostly listed as "awaiting sight of LPA Officer's Report". There are also ongoing applications in the Welsh side of the Catchment and I will provide a list to the Board as soon as I have checked for any Monmouthshire records to add to the Powys records.

In Herefordshire there are up to seven applications awaiting determination, some in the most at risk Lugg Catchment.

planning app no.	Free Range	Category	Name	Location	Post code	bird no.s (x1000)
P251744/PA7		broiler	Lady Arbour Farm	Eardisley	HR3 6NU	same?
P251383/F		broiler	Oakfields Farm	Kingsland	Leominster	HR6 9QU
P204516	FR	egg	Willey cottage Farm	Willey	Presteigne	LD8 2ND
P203904/F	FR	egg	Northgate Farm	St Weonards		HR2 8QF
P203642/F	FR	egg	Farlands Farm	Lingen		SY7 0DX
P202062/F		broiler	Arkstone Court Farm	Clehonger		HR2 9TR
P172845/F		broiler	Stag Batch House	Monkland Road	Leominster	HR6 9DA
						100

The Willey Cottage application for extension involves adding scrubbers to free range layer sheds. We have no information on whether these are effective in sheds with pop-holes. We are puzzled by the intention to permit doubling or the use of an outdoor range in Lugg headwaters (Lime Brook) and the basis for the (new?) arrangement of compensating poultry impacts by undertaking to remove cattle.

[Version date: 19 November 2025]

There are also ongoing applications in the Welsh side of the Catchment and I will provide a similar list to the Board as soon as I have added in any Monmouthshire records to the Powys records.

The NMB should understand how these decisions are made. The NMB should be updated by NRW, NE, and the Wye Catchment LPAs in England and Wales about how their policies and decision-making ensures no deterioration in the Wye Catchment waterbodies.

Response from Bannau Brycheiniog National Park Authority

Date: 19/11/2025 Officer responding: Emma Guy (Planning Ecologist)

There are six known sites within the BBNPA area that have been subject to intensive livestock units (ILU) applications within the last few decades; the most recent application was received in 2014 and approved in 2015. No sites are located within the River Wye SAC catchment. There are no current applications for ILUs within the BBNPA area.

If a valid ILU application was to be received it would be assessed on its own merits in accordance with national and local planning policy. Potentially relevant BBNPA Local Development Plan (LDP) policies include

- Policy 2 Major Development
- Policy 3 Sites of European Importance
- Policy 4 Sites of National Importance
- Policy 5 Sites of Importance for Nature Conservation
- Policy 6 Biodiversity and Development
- Policy 9 Ancient Woodland and Veteran Trees
- Policy 10 Water Quality
- Policy 14 Air Quality

There is no specific policy relating to intensive livestock production. However, there is a general policy position against major development (which may include smaller ILUs) within the National Park unless exceptional circumstances can be demonstrated. The BBNPA LDP is available at <https://beacons-npa.gov.uk/planning/draft-strategy-and-policy/brecon-beacons-national-park-local-development-plan/>

Any future ILU applications would be assessed in accordance with current Natural Resources Wales' guidance. For example, GN020 and GN 036 for ammonia emissions (see <https://naturalresources.wales/guidance-and-advice/business-sectors/farming/ammonia-assessments/?lang=en>) and 'Advice to planning authorities for planning applications affecting nutrient sensitive Special Areas of Conservation' (see <https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/advice-to->

planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-special-areas-of-conservation/?lang=en) for manure and slurry (including dirty waters).

All ILU applications within a nutrient sensitive catchment would be subject to 'appropriate assessment' in accordance with The Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitat Regulations') in the light of current NRW guidance and advice. The Habitat Regulations Assessment, following consultation with NRW, informs the planning decision. The LPA must only grant permission if it is certain at the time of decision making that the development will not adversely affect the integrity of the River Wye SAC. The LPA must also consider whether appropriate mitigation can be secured through planning conditions or obligations when considering the effect on site integrity.

Documents material to planning decisions, including consultation responses from NRW, are available for public inspection.

Response from Forest of Dean District Council

Date: [insert date] Officer responding: [insert name and title]

[Response text]

Response from Herefordshire Council

Date: [insert date] Officer responding: [insert name and title]

[Response text]

Response from Monmouthshire County Council

Date: [insert date] Officer responding: [insert name and title]

[Response text]

Response from Powys County Council

Date: [insert date] Officer responding: [insert name and title]

[Response text]

Response from Environment Agency

Date: [insert date] Officer responding: [insert name and title]

[Response text]
Response from Natural England Date: [insert date] Officer responding: [insert name and title] [Response text]
Response from Natural Resources Wales Date: [insert date] Officer responding: [insert name and title] [Response text]