

Please can NRW, NE, and the Wye Catchment LPAs in England and Wales explain how their policies and decision-making about IPU's 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 IPU's and NRW/NE grant permits for those IPU's 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 | 168 to 200 |
| P204516 | FR | egg | Willey cottage Farm | Willey | Presteigne LD8 2ND | 16 to 32 |
| P203904/F | FR | egg | Northgate Farm | St Weonards | HR2 8QF | 32 to 48000 |
| P203642/F | FR | egg | Farlands Farm | Lingen | SY7 0DX | 32,000 |
| P202062/F | | broiler | Arkstone Court Farm | Clehonger | HR2 9TR | 252-336 84 extra |
| 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.

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.

Thanks for your help.

Best wishes,

Christine

Dr Christine Hugh-Jones

Trustee CPRW and Secretary of Brecon and Radnor Branch.