

ATLSN 19180 ITEM 017

Iles, Nicholas (CCRA - Planning)

From: [REDACTED]
Sent: 11 August 2022 02:30
To: [REDACTED] (CCRA - Planning)
Subject: [REDACTED]

Hello,

I know Welsh Government will only intervene in special circumstances. However I feel this application really does fit into that category. TWO MORE developments are earmarked right near this field. Since this field is actually used by the community, and since the population of Ceredigion DECLINED by 4,300 people between 2011 and 2021, it is totally unjustified and unfair for the wellbeing of residents for this development to be allowed to go ahead.

In late 2020, an application (A201067) to build 77 houses on a community field in Waunfawr, Aberystwyth was submitted to Ceredigion County Council. The field is unofficially a community park, because it is greenfield used freely by the community. As I have experienced myself, the field has been incredibly important over the years. It is the only greenfield of use in the area, and is great for community events and get-togethers. Generally, it is socially beneficial. Naturally, when the application to build on this whole field was made, outrage started. You read the objections on the council website. There are too many to count. Everyone makes very good and valid points, notably:

This field is the only greenfield left in the area. It has been a great success in the community for decades. Many community events are held there, like weekly yoga sessions, and an annual local football tournament. (Welsh Labour says it's all about the environment...).

Flooding and drainage would be a MAJOR problem if development were to happen.

There are many houses in the surrounding streets that are AFFORDABLE and have been lying empty FOR SALE for MONTHS. They are in good condition.

The increase in student accommodation has meant that there are less houses in Aberystwyth occupied by students, therefore more houses available to the rest of the population.

What has struck me is the amount of opposition,
-on the website of Ceredigion County Council, -all over social media
-on BBC
-by councillors
-by the Member of Senedd and Member of Parliament for Ceredigion, [REDACTED]

https://ceredigion-online.tascomi.com/planning/index.html?fa=getApplication&id=58911&fbclid=IwAR1Ep7pzkqymyDJXl0XH_YSZb143yP8j6XYWRz2iYhyHbnU1aDrw0RZ0p44&language=en

<https://golwg.360.cymru/newyddion/gwleidyddiaeth/2069888-disgwyl-penderfyniad-statws-maes-pentref>

<https://www.bbc.com/cymrufyw/56339382>

<https://www.facebook.com/groups/417144922892487/about/>

HOWEVER, the council has STILL gone and approved the plan. We are awaiting a decision on an application for village green status for this field. However, unfortunately I am not confident that this Village Green application will be successful.

Since you work for the Welsh Government, I take you live in Cardiff. People from built up areas like Cardiff do not know the feeling we are experiencing right now. You have loads of green parks to enjoy. Imagine Bute Park being destroyed for ribbon development? Well that's what we're facing here with Erw Goch Field.

Please, please, for the mental sake of all residents of the wider community of Waunfawr, please can this application to build houses on Erw Goch Field be stopped. THANK YOU VERY MUCH 🌿🍀🌻🌼🌾

INTENSIVE POULTRY UNIT AT TY NANT, TAL-Y-BONT**CALLING –IN REQUEST**

1. This is an application for an intensive poultry unit for 110,000 birds at any one time, plus associated infrastructure.
2. Intensive poultry rearing has recently proliferated in Powys, Herefordshire and Shropshire. The resultant water and air pollution, smells, noise and HGV traffic are now highly controversial. Local Authorities in these areas have realised too late the effects on the environment that the proliferation of IPUs has had in their own counties. This is the first proposal for an IPU in Ceredigion, and there are concerns that if it goes ahead it will open the floodgates for such developments here. It is, in effect, a “test case”.
3. IPUs of this size are considered to be “industrial developments” by NRW, but in planning guidance they are still classed as agricultural enterprises. There is thus a “planning void” around IPUs.
4. The Environmental Statement supplied by the [REDACTED] is inadequate and lacking in objectivity. In some places the content is obviously cut-and-pasted from other documents, and thus contains irrelevant and misleading information. For example it refers to the noise from grain drying and helicopter training in the area, of which there is none in both cases (see p139). There are other examples of this. It has been suggested that if permission is granted for this development by the Local Authority on the basis of the ES provided, it may be open to legal challenge.
5. The ES refers to out-of-date planning policies and guidance. It fails to mention the Environment Act (Wales) (2016), the Wellbeing of Future Generations Act (2015), or Planning Policy Wales (11th edition, 2021).
6. Other than claiming that the development will be “sustainable” without providing any evidence (see ES, p6), the carbon footprint of the proposed development is completely ignored in the ES, contrary to Schedule 4 of the Environmental Impact Assessment Regulations (Wales) (2017) . In reality it will have a very large carbon footprint. It will be heated by gas, and will entirely dependent on materials and stock being brought into the site by HGV, from, it is thought, various locations in the west Midlands. Grown chickens, dead or alive, will be returned there. Manure will be taken by tractor and trailer (!) to an anaerobic digester 46 miles away. It has been calculated that the IPU will create HGV / tractor and trailer mileage in the region of 48,000 per annum.
7. There is no evidence in the ES that the [REDACTED] has considered the possibility that protected wildlife species or their habitats may be present at the application site, contrary to the EIA Regulations. Nor has the ancient woodland adjacent to the site been recognised. No baseline studies are offered and there is no evidence that any ecological surveys at all have taken place, or even that the relevant Ordnance Survey map has been examined. All the Applicant has done is make an arbitrary decision that no protected species are present, and therefore no Habitat Surveys are needed. (See ES, p para 2.2.8, p15)

8. The Planning Officer's report has not yet been published and we are not privy to his deliberations. However we do know [REDACTED] consulted NRW on the [REDACTED] manure management plan, and they have replied. He does not appear to have consulted NRW about the presence (or otherwise) of protected wildlife species or their habitats. Nor was the ancient woodland adjacent to the site mentioned in the Officer's correspondence with NRW. (See note (a))
9. There appears to be confusion in the ES over whether manure from the IPU will be spread on land or not. This needs to be clarified.
10. It also appears that both the [REDACTED] and NRW in their response have used out-of-date (2019) ammonia emission modeling. I quote from the Environmental Law Foundation – *"The ammonia modelling provided by the Applicant has failed to address the most significant sources of emissions from the proposed development as it uses out of date screening thresholds, and the assessment has failed to model nitrogen deposition at all. The modelling is not compliant with relevant guidance from JNCC, IAQM and CIEEM. The Applicant has failed to model for the full impacts of the development, the model findings demonstrate that the development poses a significant air quality risk to the Cors Fochno SAC, several SSSIs and other habitats and species. Habitats Regulations Assessment and in-combination assessments are consequently required. Ceredigion County Council is in no position to judge the merits of this application without the proper evidence before it, such as an up to date and accurate ammonia assessment.."*
11. The development site is 50 metres from a Listed Building, and is within Ceredigion's Northern Uplands Special Landscape Area. This latter fact is not mentioned in the ES.
12. The Development Control Committee of Ceredigion District Council has a very poor reputation. It is known to overturn at least 55% (up to 100%!) of Officers' recommendations. (see AuditWales report, October 2021). Thanks to the nature of its membership it is particularly sympathetic to the farming community, whatever the merits of an application in planning terms. Of particular relevance to this case is the fact that the Committee's understanding of the principles of sustainable development differs from that of Planning Officers (see Audit Wales report, Oct 2021, Para 50). The concern is that even if Ceredigion's Planning Officer turns the application down, the Committee will consider only local and personal issues and vote in favour of it.
13. It is also a concern that Ceredigion's Local Development Plan (publ. 2013) is many years out of date. It does not contain policies in line with the WOFG Act or the 2016 Environment Act, nor refer to the Welsh Government's Climate Emergency (declared in 2019) or its Nature Emergency (declared in 2021).
14. For all the above reasons I request that Ceredigion Planning application no. A211093 is called-in by the Welsh Government for examination.
 - (a) There appears to be a legal conundrum here. NRW will examine an environmental report **if one exists**, but the [REDACTED] has not provided one (contrary to the EIA regulations) , nor has the Local Authority identified the need for one. There is thus nothing for NRW to examine or comment on. Game, Set and Match to the [REDACTED]