Permitting Consultation Application No. PAN-00935, Penpound Farm, Newbridge on Wye, Powys for 100k broiler chicken unit.

Dear Sirs

I wish to offer the following observations with respect to the above development. It is sited in the middle of an area that supports an exceptional number of important wildlife sites as identified by the proposer's consultant. Few intensive livestock units are likely to be proposed that have 6 sensitive biological SSSIs (some of which are also SACs) within 2 km and 9 other sites within 5km (not considering locally important sites or sites with specially protected taxa). Using data from APIS many of these sites are already threatened by current atmospheric pollutant levels, particularly with respect to nitrogen compounds without taking into account the recent rapid expansion of intensive poultry units in central Wales not considered post 2014 by APIS.

The Fedw section of the Aberithon and Bedw Turbaries SSSI lies less than 0.5km to the west of Penpound. The special interest here consists of valley mire, poor fen and fen woodland. APIS assigns a critical load for ammonia to the two former habitats of 1-3ug m3. Background levels are reported as 1.2 ug m3. Fen woodland has no agreed critical load but since lichens and bryophytes form a major component with a critical load of 1 ug m3 current background levels already provide a threat to the special features of interest of this site. Total nitrogen deposition of 16.38kg/ha/yr grossly exceeds the critical load of 10kg/ha/yr. The current proposal if consented may add an additional 0.2ug m3 (20%) of ammonia and 0.4km of nitrogen to an already stressed habitat.

A similar picture is presented by the acid grassland SSSIs of Rhos Dwfnant and Gwaunydd Dwfnant. Both sites have proved difficult to manage recently since appropriate grazing has been impossible to secure resulting in a lower than desirable off-take of nutrients via grazing stock and a hay crop has ceased to be taken from part of one site. Critical load information for the rather complex and variable grassland vegetation of these sites is sparse. Considering the drier ground elements as the EUNIS "Non Mediterranean dry acidic and neutral closed grassland" with a critical load of 10-15 Kg N/ha/yr again current background levels exceed this by a third and this development if proposed would add an additional 0.4 kg.

Similar concerns apply to ancient semi-natural woodlands as identified in the application which ring the site. In addition and not considered in the application are a series of sites likely to be selected as sites of county importance closer to the development site than the SSSIs. Surrounding Dwyfnant to the NNE of Penpound (the "Unknown" property in the odour analysis) are three species-rich meadows that support nutrient sensitive habitats and species of county importance such as Southern Marsh Orchid and Pale Sedge. Their presence enhances the value of the nearby SSSIs. The two adjacent ponds to the house are important for amphibia including a significant population of the specially protected great crested newt. No information is provided as to the distribution of dust particles from this development likely to be rich in phosphate, a significant pollution risk to freshwaters. The larger pond lies less than 300m from the roof vents of the proposed houses. Nor is any indication given as to the likely fate of the poultry manure. Fields owned by the applicant at Penpound form part of the catchment of the larger pond and lie adjacent to two SSSIs.

The application notes the lack of any local meteorological data, attempting to make up for this problem by using data from three distant locations, none of which really reflect the area around the

application site. The Sennybridge data comes from a high altitude (309m) site on a high plateau where temperature inversions are rare. Trawscoed is a low-lying site close to the coast with few frosts. Shobden whilst being in a valley bottom location is not surrounded by high hills and has substantially less rain than Penpound. The development site lies in a frost pocket on the edge of the well-known Llandrindod frost pocket and is subject to regular temperature inversions. It seems likely that local deposition levels may be higher than those predicted in the model. Unacceptable exceedances of both ammonia and nitrogen compounds from this proposed development are predicted for the Wye SAC on the existing inadequate meteorological data. The R Ithon-part of the SAC is also affected. The catchment of this river is already being adversely affected by the cumulative impact of large numbers of unregulated (and a few regulated) poultry units. In total more than a million chickens are now housed in this catchment. Should Natural Resources Wales continue to wantonly ignor the cumulative impact of intensive livestock units the organisation must run the risk of ceasing to have any scientific credibility and bring Welsh Government into disrepute.

On the data presented by the developer and on the precautionary principal I believe this development is too large for such a sensitive site and a consent should be refused.

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