

EPR / NP3038WF



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Ein cyf / Our ref: AJ/487

Eich cyf / Your ref:

Ffôn: 01248 384217

Dyddiad / Date: 17th November 2014

Dear Ms Plant

Re ENQ 362 Environmental Permit Consultation: Intensive Poultry at Brynoria, Powys

Further to your consultation received on 03rd November 2014, we offer the following observations

Ammonia and odour emissions must be considered and regulated appropriately. A site ammonia and odour management scheme is recommended to be implemented and sustained to ensure no adverse ammonia concentrations or odours at nearby sensitive receptors.

Manures can contain a range of zoonotic pathogens and incorrect storage can encourage the development of large fly populations that can have nuisance or disease transmission potential. We would expect that the design, construction and management of manure stores will prevent or minimise emissions (and flies) and that such controls to be exercised through standard permit or planning conditions.

The farm operator should be required to devise, maintain and review a manure management plan detailing when and where manures will be stored and applied to land. The plan should be completed during the planning process or before a permit is issued and contain details of the control measures to avoid ground water contamination.

The potential impact to water should be low since discharges to ground or surface water should fully comply with the Groundwater Regulations 2009 (via the Environmental Permitting Regulations 2010).

Dusts and bioaerosols (airborne particles that contain living organisms, fragments, toxins, and waste products) may have possible health effects including exposure to infectious diseases, allergic reactions, respiratory symptoms and lung function impairment. It is likely that the dispersion of bioaerosols will be dependent upon environmental circumstances such as local topography and prevailing weather conditions.

Mitigation measures addressing occupational health of workers within the farm and farm buildings will contribute to the protection of local communities. Best Available Techniques; including dust management plans, are required by permit conditions to avoid or mitigate emissions, including fugitive emissions.

There is little evidence on the health impacts from bioaerosols from intensive poultry farms. However, composting sites are known to produce considerable quantities of bioaerosols. When permitting composting industries regulators have considered a minimum distance of 250 metres from local communities. However exceptions to this 'limit' are allowed if effective mitigation techniques are employed.

This limit is based on published studies which indicate that bioaerosols are generally reduced to background levels within 250 metres of the facility, although it is accepted that under certain circumstances, such as stable atmospheric conditions, bioaerosol concentrations may occasionally not be reduced to background levels within 250 metres.

Manure and dust management plans should therefore also contain actions to avoid and mitigate offsite dusts and bioaerosols during adverse dispersion weather conditions.

It is not clear whether an empirical noise assessment of fixed plant and operational activities has been undertaken. The regulator must therefore be sure that the noise from the proposed activities does not cause nuisance at nearby sensitive receptors.

A cumulative impact assessment for each of the issues discussed above must be undertaken for any additional poultry units proposed.

Conclusion

Intensive poultry farms may cause pollution but provided they comply with modern regulatory requirements any pollutants to air, water and land are unlikely to cause serious or lasting ill health in local communities.

Yours sincerely



Andrew Jones

Cyfarwyddwr Gweithredol Iechyd Cyhoeddus / Executive Director of Public Health

Cop to: Huw Brunt
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