

From: [REDACTED]

Sent: 29 April 2019 12:00

To: Banks, Andrew

Cc: Bishop, Kevin; Norman, Felicity (Cllr); bill.wiggin.mp@parliament.uk; The office of Bill Wiggin; Demaus Robert

Subject: Re: Planning Application P1728 45 /F Proposed erection of two broiler units and associated works at Stagbatch House

Proposed erection of two broiler units and associated works at Stagbatch House

With reference to the above application, and our letter to you of 25 February 2019 concerning issues associated with air pollution, I have attached a photograph of emissions from the biomass boiler at Stagbatch House. The photograph was taken on Friday 19 April (i.e. during the Easter weekend, when temperatures reached record highs). The boiler was running through most of the weekend.

Retrospective permission was granted in March 2018 for a 550kw biomass boiler for the purposes of crop drying, and heating of workshop and farmhouse.

It is not clear which of these permitted uses was required over the hottest Easter Bank Holiday weekend on record, but our great concern is that if this level of air pollution is created at this stage (i.e. when the bio-mass boiler is presumably lightly loaded), how much greater will be the pollution when the same bio-mass boiler is used to heat over 4,600 square metres (i.e. approximately 1.2 acres) of additional building, as is proposed in the above application.

The odour report does not take into account the cumulative effect of the emissions from the cattle sheds and bio-mass boiler, when combined with the emissions from the proposed very large poultry production buildings.

With every week that passes, concern is growing amongst scientists and the general public over the very damaging effects of air pollution

I trust that the above will be given due consideration in the determination of this application.

I would be grateful if you would acknowledge receipt of this email. I have also attached this correspondence as a word document

Yours sincerely,

Robert Demaus.



On 25 Feb 2019, at 12:07, Robert Demaus [REDACTED] wrote:

Dear Mr Banks

Planning Application P1728 45 /F

Proposed erection of two broiler units and associated works at Stagbatch House

With reference to the above application, there are two issues to which I would like to draw your attention.

Air Pollution

The UK Emissions Interactive Map – NAEI (Link herewith:-
<http://naei.beis.gov.uk/emissionsapp/>)

As you may already know, this shows the emissions of a range of air pollutants in any 1km x 1km square of the UK.

Of particular relevance in assessing the above application is the 1km x 1km square immediately to the east (i.e. downwind) of the proposed site, that covers Cornhill Cop and a large section of Baron's Cross. This has the highest emission levels for ammonia and zinc, and second highest emission levels for particulate matter PM10 and PM2.5, carbon dioxide, nitrogen oxides as NO2 and sulphur dioxide. The primary sources of a number of these emissions are likely to be the existing cattle rearing operations at Stagbatch House and Cornhill Cop Farms, both of which rear approximately 400 head of cattle, housed indoors in winter and mixed indoor/outdoor housed in summer. The biomass boiler at Stagbatch House was installed after the above map was produced.

It is these pollutants that the proposed construction of 2no. very large IPUs housing approximately 100,000 broiler chickens together with the associated biomass boiler would greatly increase, immediately upwind of Herefordshire's second largest urban population – an area already acknowledged to have significant air pollution issues, as is so clearly demonstrated by this interactive map.

It is also noticeable that in other 1km squares covering the Leominster conurbation, emissions register in the highest or next highest band for the great majority of all the pollutants measured. Whilst not all of these emissions can be attributed to agriculture, there is growing evidence that intensive stock rearing does contribute very significantly.

I would also draw your attention to Paragraphs 180, 181 and 183 of the NPPF.

Water Pollution:

Herefordshire's water quality and the Nutrient Management Plan (produced by CPRE based on autumn 2017 data) shows 12 month average Environment Agency phosphate levels at sampling points. (Link herewith:

<https://www.cpreherefordshire.org.uk/assets/Documents/newsletter/45683cd566/2018-April-HCPRE-Herefordshire-Highlights-newsletter.pdf>)

Those sampling points on the R Arrow just downstream of locations into which Stagbatch House land drains are already consistently all above the phosphate limit, and the report states that the R Lugg is heavily and continuously over the limit. The proposals will increase manure spreading on Stagbatch House land.

The map is based on data up to Autumn 2017. As of that date only five out of 49 sampling points were 'green' i.e. within the ceilings. The graphs show that when the Board started work in Autumn 2015 eleven points were green.

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Yours sincerely,

Robert Demaus.

On 15 Jan 2019, at 17:34, Robert Demaus [REDACTED] wrote:

On 2 Jan 2019, at 13:17, Robert Demaus [REDACTED] wrote:

Dear Mr Banks

Further to my email to you of 14 December 2018, I have attached herewith a link to a very relevant and timely article, published in Poultry World on 28 December 2018. This highlights the lack of preparation in the UK to cope with a major Avian Influenza outbreak. Daniel Roberts, author of the recently published Nuffield report Living and Dying with Avian Influenza states “The role of increasingly intensified global poultry systems in the spread of AI cannot be ignored and will need to be addressed in any future strategic planning within the UK if we are to truly mitigate the risk of a catastrophic outbreak to industry and to British citizens.” Mr Roberts also states that such an incursion is inevitable, and preparing for it will require both improving current procedures, and considering the overall structure of the British poultry industry.

As Herefordshire already has one of the highest densities of Intensive Poultry Units in the world, it is clearly at very high risk, and the “inevitable incursion” would indeed be catastrophic for the whole county, not just its farming industry.

If the council is seen to have ignored the DEFRA Code of Practice, and allowed development of new IPUs within 3km of existing units, questions will inevitably be asked over the council’s role in that catastrophe.

It is perhaps important to stress that this article was published in the UK poultry industry’s own magazine, and cannot be dismissed as ‘anti-farming’ propaganda, as some might try to do.

To further assist your understanding of the gravity of this issue I have also attached the complete paper written by Daniel Roberts under the aegis of NuffieldUK. Again, it is perhaps important to stress that the research is sponsored by The Worshipful Company of Farmers and Savills with the Poultry Meat Group: Aviagen, Cobb Europe and Hubbard, all of whom clearly have the agricultural industry’s interest at heart.

I would particularly like to draw your attention to one paragraph in the Executive Summary of the report, which I include verbatim below:

Whilst biosecurity can mitigate the risk, the size and increasing number of factory farms will achieve the opposite. Hard questions need to be asked in the UK about the location of new farms. How much further we grow the industry against the threat to citizen’s health must also be addressed by Government, industry and health officials

I quite understand that you are very busy, but I would be very grateful if you could acknowledge that you have received this and previous emails, and that you have been able to download the attachments satisfactorily.

With best wishes for 2019

Kind Regards

Robert Demaus

On 14 Dec 2018, at 17:03, Robert Demaus [REDACTED] wrote:

Dear Mr Banks

With reference to the current application for very large intensive poultry units at Stagbatch House, I would like to draw your attention to the DEFRA Code of Practice for the Welfare of Meat Chickens and Meat Breeding Chickens 26:03:2018 – *‘When planning new sites, consideration should be given to providing the maximum possible distance between the proposed site and existing sites to improve biosecurity. A useful guide is the 3km distance that defines the radius of a Protection Zone in the control of notifiable diseases such as highly pathogenic avian influenza. The distance between houses on a site should also be considered, along with the proximity to wild bird sources’*

There are already 3no. intensive poultry units within a 3km radius of these proposed units. If permission were granted, this would clearly conflict with DEFRA’s own Code of Practice.

Cases of avian influenza were identified in wild birds in England in 2018, and between 18 Jan 2018 and 25 May 2018, the Avian Influenza Prevention zone was extended to cover whole of England. DEFRA’s latest advice (13 Dec. 2018) is that all areas in Great Britain remain at risk of avian influenza in wild birds. It is generally considered that it is only a matter of time before avian influenza is found in commercial poultry flocks, as has already happened in Holland. Again, clearly the density of poultry sites within a given area is critical.

Poultry World reported on Mar 2. 2018 – **‘Highly pathogenic avian flu outbreaks have affected countries in Europe, Asia and Africa in the past week. Countries hit are the Netherlands, India, South Africa and Saudi Arabia.’**

Given that there is a greater density of intensive broiler units in north-west Herefordshire than nearly anywhere else in the world (*David Forbes, Chair of Lugg & Arrow Fisheries Association 2014*), there is a clear need to abide by the DEFRA Code of Practice as a bare minimum.

Furthermore, in Herefordshire Council’s own publication **‘Building Biodiversity into Herefordshire’s Local Development Framework’** Dec. 2009, the land at Stagbatch Farm is

recorded as an important habitat for wild birds, including 'Nationally Protected Species'. The map identifies a 250m buffer zone around the location - this, of course, includes the IPU site.

My father-in-law lived at Stagbatch for 30 years [REDACTED] and was a keen naturalist, regularly recording sightings of resident and migrant birds at Stagbatch Farm. He recorded over 63 different bird species at Stagbatch Farm within the last 20 yrs. Sadly, some have disappeared in the last few years, with five birds on the Red list and five on the Amber list not seen in the last two years. A principle factor in this decline is intensification of farming. He also recorded 17 no. different butterflies in the last 10 years.

We have continued the recording, and in the last two years the list has included five birds on the BoCC4 (Birds of Conservation Concern 4) Red list, and four birds on the Amber list.

It is quite clear that wild bird populations, already threatened by so many factors, are also greatly at risk from avian influenza, and particularly emergency measures that might be put in place to prevent spread through commercial flocks, and any intensification that is seen to conflict with DEFRA's own guide lines, can only exacerbate the problem.

I would ask you to confirm that you have received this email and that the issues raised will be given due consideration.

I do look forward to hearing from you.

Kind regards,

Robert Demaus

Andrew Banks.
Planning Department - Northern Area.
Hereford Council
Blueschool House.
Blueschool Street.
Hereford
HRI 2BZ

29 April 2019

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