

CYNGOR CYMUNED SESSWICK
SESSWICK COMMUNITY COUNCIL

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P/2022 /0820

AMRYWIO AMOD 07 O CANIATAD CYNLLUNIO APP/H6955/A/18/3216187 (P/2017/1032) I CANIATAU PROSESU 2,000,000 O ADAR YR WYTHNOS / VARIATION OF CONDITION 07 OF PLANNING PERMISSION APP/H6955/A/18/3216187 (P/2017/1032) TO PERMIT THE PROCESSING OF 2,000,000 BIRDS PER WEEK
MAELOR FOODS PICKHILL LANECROSS LANES WREXHAM LL13 0UE

P/2022 /0821

AMRYWIO AMOD 07 O CANIATAD CYNLLUNIO APP/H6955/A/18/321690 (P/2017/1038) I CANIATAU PROSESU 2,000,000 O ADAR YR WYTHNOS / VARIATION OF CONDITION 07 OF PLANNING PERMISSSION APP/H6955/A/18/321690 (P/2017/1038) TO PERMIT THE PROCESSING OF 2,000,000 BIRDS PER WEEK
MAELOR FOODS PICKHILL LANECROSS LANES WREXHAM LL13 0UE

P/2022/0822

AMRYWIO AMOD 07 O CANIATAD CYNLLUNIO APP/H6955/18/3216188 (P/2017/1037) I CANIATAU PROSESU 2,000,000 O ADAR YR WYTHNOS / VARIATION OF CONDITION 07 OF PLANNING PERMISSION APP/H6955/18/3216188 (P/2017/1037) TO PERMIT THE PROCESSING OF 2,000,000 BIRDS A WEEK
MAELOR FOODS PICKHILL CROSS LANES WREXHAM LL13 0UE

P/2022/0840

ESTYNIAD I WAITH TRIN DWR GWASTRAFF A GWAITH CYSYLLTIEDIG//EXTENSION TO WASTE WATER TREATMENT WORKS AND ASSOCIATED WORKS
MAELOR POULTRY PICKHILL LANE CROSS LANES WREXHAM LL13 0UE

GRID REF: E 338510.4 N 346705.93

To the Chief Planning Officer,

Sesswick community Council makes strong objection to the above planning applications by Maelor Foods to expand their production from 1 million birds per week to 2 million birds per week.

It has been the case since this site started operations that Maelor Foods are unable to receive the current numbers of birds per week. Such is this inability of Maelor Foods to receive and process incoming birds that vehicles transporting the birds are being required to park in roadside lay-bys and wait until they are called into the

factory; this is confirmed in the photographs of the parked vehicle in the layby on the A483 that is transporting a full load of birds to Maelor Foods on 24 August 2022 at 10.19am and a further photograph of a vehicle parked just 5 minutes away from Maelor Foods on 15th October at 8:15 am. (**See images 1**).

Every day not only are these vehicles parked along the A483 but in the layby at the Plassey Roundabout at Eyton, less than three miles from Maelor Foods; this can only confirm the way Maelor Foods alleviate the congestion of vehicles arriving at their site, while birds suffer.

There has been as many as 7 Vehicles seen on site waiting for lengthy times to off load livestock with birds suffering on vehicles with no ventilation and exposed to the elements of weather. Vehicles have even been required to drive around the local roads to ventilate overheated birds whilst waiting to be called in.

It is a daily common site to see several vehicles transporting birds to Maelor Foods parked in laybys along the A483. It asks the question of how many vehicles transporting birds to Maelor Foods are parked in laybys at any one time.

Not only are Maelor Foods unable to receive the current number of birds, but do not have the appropriate lairage facilities to receive livestock in these numbers that will ensure birds do not suffer. (**See image 2 below**).

Birds need ventilation while waiting in parked vehicles at the factory, they should be in covered buildings and ventilated with fans to keep birds at the correct temperature and moisture while waiting to be unloaded. This does not happen at Maelor Foods with livestock waiting on vehicles with no ventilation and exposed to extremes of weather, and especially in the recent extreme heat wave, and when parked in laybys, especially in such temperatures, they require ventilation, which they are not getting and suffering as a result.

Correct lairage and ventilation as described above is a basic requirement by the various bodies, Red Tractor, and Department for Environment Food and Rural Affairs (DEFRA).

DEFRA states that...

- *The vehicle and its loading and unloading facilities are designed, constructed and maintained to avoid injury and suffering and to ensure the safety of the animals. (See image 2)*
- *No one shall transport animals, or cause them to be transported, in a way likely to cause them injury or undue suffering*
- *Journey times are kept to a minimum.*
- *When heat builds up within a vehicle (usually because of inadequate ventilation), a point can quickly be reached where the animals are no longer able to regulate their own body temperature – and therefore are likely to suffer or even die.*
- *Poultry are particularly prone to thermal stress during transport and remedial action may need to be taken quickly if unsuitable conditions develop during the journey (see Defra publication PB 11260*).*

*Defra Publication PB11260**

(Livestock Transportation – A Guide to Practice for Vehicle Ventilation)

- *Ventilation within your vehicle is important to remove the heat and moisture*

produced by animals during transport.

- *During transport, thermal conditions around the animals are the greatest stressor to the animals.*
- *Air movement through ventilation can remove heat AND moisture. This allows better heat loss from animals.*

How can this factory accommodate an increase from 1 million to 2 million birds per week when they are unable to receive and accommodate current levels of 1 million birds per week and allowing livestock to suffer? They cannot justify this increase.

Phosphates in our Rivers

The Maelor Foods factory via a treatment plant discharges waste into the river Dee, this is a nationally important river, an area of special conservation and an important source of drinking water for more than three million people.

There has been concern over this discharge for some time and more recent concern when a fisherman noted a colour discharge from the outlet pipe of the treatment plant into the river Dee, (*see images 3 below*).

This discharge will result in an increase in the current high level of phosphates recorded in the river Dee. It is of even greater concern to learn that when this discharge was reported, Natural Resources Wales were not aware of this discharge point. This immediately suggests that this release into the river has not been monitored for levels of discharge or recorded in line with Natural Resources Wales permit regulations.

Furthermore, Natural resources Wales state that not only should you routinely measure, monitor and record the sewage treatment system and discharge points, but together with the other points stated as follows...

- *check treatment plant operating effectively,*
- *ensure that the sample point is accessible at all times.*
- *desludging should take place at least once a year*
- *check the discharge point to watercourses for any adverse effects on the receiving waste*

From the photographs in *image 3* it is clear that there is no access to this discharge point and questions how are they able to make the necessary observations and checks to the riverbed and surrounding environment. It asks the question as to whether at any time their treatment plant discharge has been measured, monitored, checked for correct operation with full records made including regular maintenance, and whether there is the appropriate risk assessment in place and emergency procedures.

The presence of nutrients, especially phosphorous and nitrogen in wastewater effluents and their impacts on natural water bodies, continue to be a major concern.

The doubling of effluent this application will involve can only increase the levels of phosphates in the river Dee, irrespective of any extension to the treatment plant.

Biological treatment processes remove only 50% or less of sewage phosphate and nitrogen, both the cause of eutrophication, and moreover, nitrate is a risk

to human health, especially as a possible cause of infant methaemoglobinaemia.

All of the Welsh rivers have alarmingly high levels of phosphates, and if discharge levels are not monitored and reduced, phosphate and nitrogen levels in our rivers will never be under any control or reduction.

Many current planning applications have either been put on hold or completely refused until the problem of phosphates created by industry and farming have been resolved, this application should not be exempt from a postponement or refusal as in the case of other planning applications refused or placed on hold.

Also, this application will double employee numbers by 125 at Maelor Foods, this increase in employees together with the increase in production will produce a marked increase in phosphates levels into the river Dee. Many applications have been refused on the basis of increased numbers of people associated with a planning application, and this application should not be exempt from these same considerations and reasons for refusal.

Complaints against Maelor Foods

Of the many complaints made against Maelor Foods we have never seen any action, response or appropriate procedures from Maelor Foods that conform to the requirements stated by Natural Resources Wales as follows...

You need a procedure that records:

- *any complaints you receive in relation to activities covered by your permit (for example complaints from neighbours about noise, odour or dust from your site)*
- *how you investigate those complaints*
- *any actions taken as a result of complaints*

It can be used as evidence that you've taken appropriate action to rectify any issues if Natural Resources Wales receives complaints about your site.

Residents have never seen evidence from Maelor Foods that follows any type of procedures or action taken necessary to resolve the many issues and problems that residents have complained about. It begs the question whether there are any records at all made of these complaints.

Junction of A525 and Pickhill Lane

The junction of the A525 and Pickhill Lane up to Maelor Foods is on a dangerous downhill bend, where many unreported accidents happen; the farmer living on the corner of Pickhill Lane and the A525 can confirm this. It is proposed in the application that this junction will be sited further up the hill on the A525 with a current 40mph limit which vehicles ignore most of the time. **When vehicles are turning right off the A525 up Pickhill Lane, there would be even less time and distance for large vehicles to be able to slow down or pull up when one of these HGV's turns uphill along Pickhill lane from a standstill after allowing oncoming traffic to pass, this presents an even greater danger than at present.**

The Preserve of Sunday. (Noise and Light pollution)

This application proposes to have a full working Sunday with large numbers of HGV's and employees visiting the site. It is only right and correct for the wellbeing of residents living in the near vicinity of Maelor Foods and especially on Pickhill Lane that they should have their Sunday at home in peace with no light pollution, no disruption or noise from HGV's, no operational noise and no disturbance from this site. *This right of peace and well being covered by the Environmental Health Act 1990 79. 1(fb), 1(g), 1(ga).*

Some of the many untrue statements in the application documents.

Planning Application P/2022/0821 "Community Engagement Report"

This section which talks about engagement by Maelor Foods with residents and neighbours is not a true factual report, many of the paragraphs are untrue, (e.g paragraph 3 first page), with respect to engagement with residents, community council and county councillors. Maelor Foods and their consultants, BECG communications consultancy, authors of the community engagement report, have not been able to engage with the Sesswick community, county councillors or residents. They do not know or understand the issues that Maelor Foods have failed to resolve.

Variation of conditions application - Planning statement

This document again has many false claims with regard to animal health stated in 1.5. Birds are suffering in stationary vehicles with no ventilation and Red Tractor states that undue suffering during transport should be avoided.

Variation and Condition Application - Residential Amenity

11.17 this is an untrue statement. The traffic movement has had a severe detrimental impact on people living near this site and along its route. Nearby residents are unable to get a single nights peaceful sleep with the noise of HGV's.

11.22 This is a statement that is not correct. Residents have stopped complaining because Natural Resources Wales (NRW) was doing nothing about the complaints and many complaints were not even recorded by NRW.

11.23 Again a false statement. Residents still complain about Maelor Foods, however, many stopped complaining because nothing was done to resolve their complaints.

The many documents in the planning application are designed and worded to make and convince decision makers that Maelor Foods expansion is good for the area. Maelor Foods have had little regard for problems and issues and have done little, if anything, to resolve the many problems this site has imposed on residents and people have given up complaining. Maelor Foods have only recently asked limited numbers to engage with them to support their current application claims. They have not attempted to engage with the local community as a whole, which accounts for the reason why so few residents know about this latest application.

How can this company be given permission to increase their current numbers of livestock when:

- They are unable to receive the current numbers of birds without delays, with vehicles having to park in laybys to ease the congestion at their site and their inability to receive birds swiftly without them suffering.
- The welfare of livestock is in serious question
- There is apparent uncontrolled and unmonitored effluent discharge into a

nationally important river with serious impact on phosphate levels.

- In a location that is unsuitable for the present number of HGV's, with an inadequate road infrastructure to serve it.
- That has failed to understand and resolve the many complaints made against them, and in fact ignores complaints.

Maelor Foods are looking to increase production, which will be 5 times the original number of birds per week and five times the noise, disturbance and impact on roadways and people's lives and serious questions about animal welfare. This company has made little effort, if any, to resolve the many issues and complaints raised against them with little regard to the many conditions and regulations, causing severe adverse effects on the lives of people living in the area, an adverse impact on the neighborhood, environment and wellbeing of individual people.

I trust you will again refuse Maelor Foods permission for this expansion

The following pages show images 1 to 4 to refer to and in support of this letter of objection.

Yours faithfully

On Behalf of **Sesswick Community Council**

J Picken

Miss J Picken

Clerk to Sesswick Community Council

Please see supporting photographs on following pages.

Image 1:

Pictures of parked vehicle transporting birds to Maelor Foods, this situation is observed in all types of weather and there is usually more than one vehicle transporting birds to Maelor Foods parked up in laybys along the A483.



The pictures below are of a parked vehicle on Saturday 15th October 2022 at 8:15am transporting birds to the Maelor Foods site and parked at the Eyton roundabout, just five minutes away from Maelor Foods which confirms that this layby, like those along the A483, is used as a means of easing the congestion of vehicles at the Maelor Foods site with livestock suffering in the vehicles as a result.

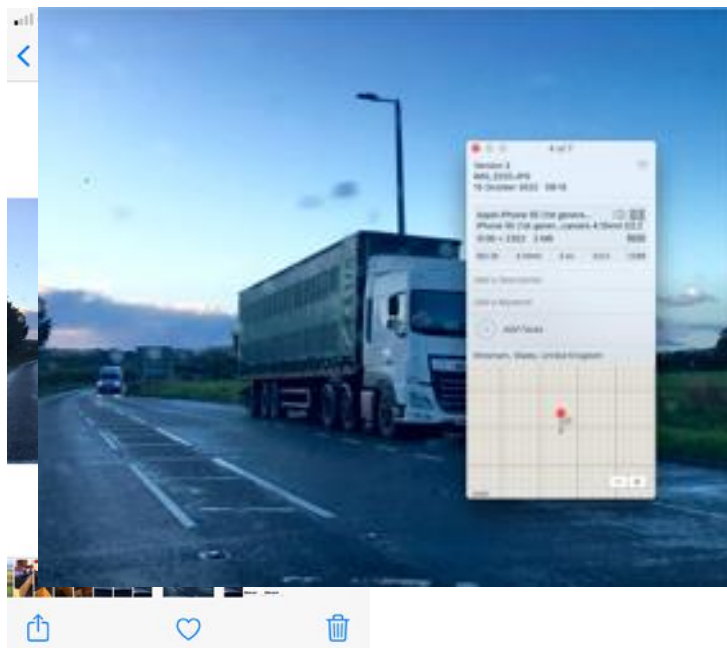


Image 2:

Typical lairage with ventilation fans at a chicken-processing factory. Ventilation is a basic requirement for the lairage of poultry to ensure that birds do not suffer.

Such lairage facilities do not exist at Maelor Foods.

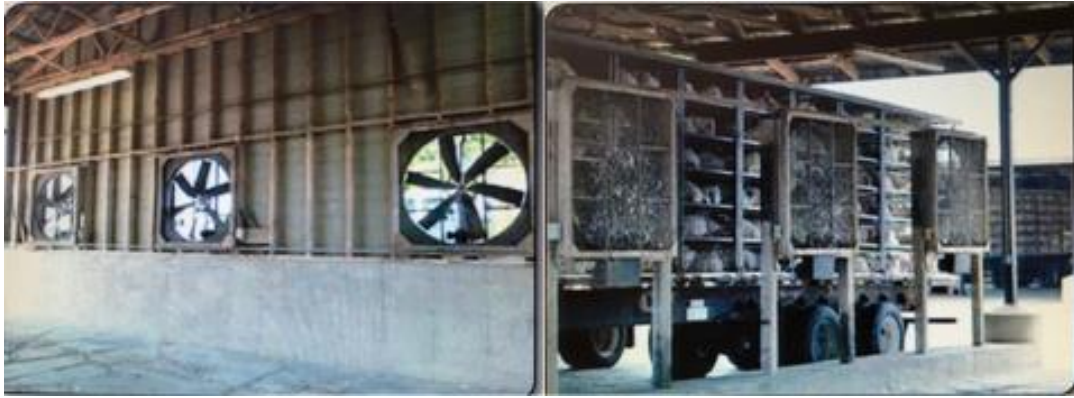


Image 3:

Pictures showing the discharge point into river Dee from the Maelor Foods treatment plant, as of August 2022. Far right picture clearly showing no access to the discharge point, no ability to check, record or monitor discharge levels and no access to monitor any effect to the riverbed or local environment. Left picture shows the volume of discharge.



Phosphates are a serious problem in our rivers.

Phosphates originate from many sources, including **sewage** and **manure**. Only 30–40% of phosphorus is removed from final conventionally-treated effluent as microbial biomass. In a similar way to nitrate – although an element vital for life – excess phosphate in watercourses causes a nutrient boost, which often equates to **excessive algae growth**. The algae may then produce **toxins** that adversely affect the aquatic ecosystem, reducing oxygen levels, impacting fish stocks and **leading to loss of species and degradation of the waterway**. Unlike nitrate, the amount of phosphate in drinking water is not regulated, although the World Health Organisation has provided a minimum ‘safe’ level of around 5mg per litre, and levels above 100mg/l can affect processes in water treatment works. **It has been confirmed that all of the rivers in Wales have high levels of phosphate, only by reducing discharge levels can this be reversed.**

Image 4:

Pictures of HGV's turning at Junction of A525 and Pickhill Lane showing the size and impact on the junction of a slow vehicle moving uphill across the downhill traffic of the A525 and the dangers it imposes on traffic on this highway.

If this junction is to be sited further up the hill on the A525 it will leave less distance for HGV;s to slow down or stop when HGV's are turning off the A525 up Pickhill.

