

Tel:

10 October 2022

Mr Nick Atkinson

Wrexham Council Planning Dept.

Dear Mr Atkinson

Maelor Foods Planning Applications P2022/ 820, 821, 821 & 840 all dated 12 Sept.2022
Site Address: Maelor Foods, Pickhill Lane , Cross Lanes, Wrexham , LL13 0UE

We objected to the previous application when Maelor Foods wanted to increase their plant capacity from 400,000 birds/p.a to 1million. We corresponded at the time with the Planning Inspectorate and attended and spoke at the one day appeal hearing. Please accept this as a letter of objection to the current application by Maelor Foods to increase capacity to 5 times the original consented operation now to 2 million birds p.a.

We were very disappointed by the decision on appeal to allow the previous expansion and fear that because:

1. The arguments against this application are substantially the same only magnified by a factor of 2.
2. WCBC having lost on appeal last time, and therefore being liable to costs may be disinclined to object rather than face a similar outcome.
3. There is some doubt about the impartiality of the Planning appeal process. In the previous appeal, despite strong and very numerous objections and objectors, the process seemed to be administered more "to be seen to have been done" by providing an opportunity to object albeit in a very limited manner. The situation is possibly worse now as the Gov.UK website states that "On 1 October (2021) the staff and functions of Planning Inspectorate Wales will transfer to Welsh Government." We have written to Simon Baynes MP and Ken Skates MS about this as local democracy seems to be being disregarded.
4. Welsh Government TANS such as TAN 18 sets out many laudable objectives which if genuinely adopted in planning decisions would help Wales become a safer and environmentally better place to live.
Section 2.3 of TAN18 sets out a number of requirements including:
 - that new development to be located where there is, or will be, good access by public transport, walking and cycling thereby minimising the need for travel and fostering social inclusion;
 - major alterations to existing developments to include appropriate provision for pedestrians (including those with special access and mobility requirements), cycling, public transport, and traffic management
 - the location of development should be near to other related uses
 - good quality design of streets that provide a safe public realm and a distinct sense of place;

- that the transport infrastructure or service improvements necessary to serve new development allows existing transport networks to continue to perform their identified functions.

If Maelor foods was located within the Industrial Estate itself with access being from the North an expansion would seem to meet these requirements. That is what the industrial estate is designed to do. Another expansion on the same site exacerbates the traffic issues in the country lanes nearby with increased HGV traffic bringing in live chickens, taking away finished product and waste (the vehicles that are particularly smelly) plus all the ancillary services necessary for an industrial operation.

Section 2.13 of TAN 18 states: The Road Traffic Reduction Act 1997 (the 1997 Act) obliges local authorities to review current levels of traffic on local roads, forecast the anticipated growth in traffic levels and specify any targets for reducing the levels of road traffic or its growth. This application to expand capacity will achieve the opposite, therefore WCBC must take into account concerns about increased traffic.

3.11 states: Development in rural locations should embody sustainability principles, balancing the need to support the rural economy, whilst maintaining and enhancing the environmental, social and cultural quality of rural areas. This application will further degrade those qualities of this rural area.

8.12 states (paraphrased) Development which attracts substantial movements of freight should be located away from residential neighbourhoods and Development plans should identify and allocate sites which have direct access to the trunk or principal road network and they need to strike a balance between the need to protect the vitality of the local economy, and the overall quality of life for local residents

1. As part of the appeal process for the previous application Maelor foods submitted a map showing the wide area from which chickens would be supplied. This document was known as: APP25 - APPLICATION PLANS INCLUDING LIST - 382031 - L01_Map 1-Farm Suppliers of Live Birds for Appendix 1 - 21.11.17 - Rev P1, The Planning Inspectorate no longer show this but at the time suppliers were shown as predominantly from the South west of Maelor Foods. We can find no data as to where their chickens are supplied or proposed to be sourced from. Maelor Foods should be asked to show the vehicles routes and numbers over the last 2-3 years and what they anticipate the future traffic will be.
2. As stated in the previous objection there is no suitable road infrastructure to the South of the Industrial Estate. The main route from the south is from the A483, the B5426, A528 then the B5130 to the A525. These are narrow country roads, the B5426 with significant traffic calming because of accidents, and passing close to a primary school. We have lived here for 30 years and now can no longer walk or cycle nor can we access public transport as the 1 mile walk to a bus stop is too hazardous. The route south on the A525 is also closed on many days every year due to flooding resulting in an intolerable increase in traffic on the B5130.
3. Traffic considerations must also take into account a wider road infrastructure than the junction of Pickhill lane and the A525. That junction is far from ideal, but beyond the Maelor foods premises the country lanes to access the main routes to the South are

unsuitable for heavy traffic. Maelor Foods own previous advisors Mayer Brown drew attention to the fact that left turning HGVs exiting Pickhill lane have to use the whole road. Such vehicles have been timed as taking 5 to 11 seconds. The survey carried out previously of traffic at that junction showed vehicles passing the junction every 6 or 7 seconds during the morning and afternoon peaks. Doubling of vehicle movements related to Maelor Foods will double the probability of incidents and traffic hold ups.

4. Levels of traffic generally have also significantly increased over recent years, including that associated with the largest prison in the UK on the Wrexham Industrial Estate. Much has previously been made of historical “quotas” used or unused by the neighbouring Lloyd Frazer haulage business to justify the Maelor Foods HGV traffic. Such comparisons fail to take into account numerous other changes to traffic, new businesses on the Industrial Estate, revised road layouts or the size of vehicles. Selecting just one set of historical data is not sufficient.
5. Maelor Foods previously assured WCBC that production would not be increased from 400,000 chickens. It was disingenuous to obtain consent to “secure a foothold” for an operation of a certain scale and then just one year after opening to increase the scale to a level that would never have been approved initially and to do so again, now to seek a five fold increase, how many times will Maelor Foods test what they can “get away with.”
6. Despite the words from the applicant regarding smells, since their plant has operated there has definitely been an increase in unpleasant smells although many people are unaware of the source . We understand that such operations are regulated but because of the proximity to residential property any deviation from permitted levels has an enhanced impact on peoples ability to enjoy their own homes. It may well be that permitted levels for smells are actually set too high given the location.

It is our wish that the WCBC Planning Dept takes into account the entitlement of the neighbours of this facility to a level of residential amenity that we have a right to expect and is appropriate for those of us who have sought to live in the countryside.

A proposal to increase noise, smells and traffic arises because this chicken processing plant is fundamentally in the wrong place. If a larger facility is required Maelor Foods should be asked to relocate within the Industrial Estate and within easy access to the new road infrastructure to the North. They will exaggerate the likely cost of this but should be asked to provide an auditable estimate that can be considered as part of the process of determining a planning decision. The local authority should also either plan for a new more suitable road into the Industrial Estate from the South, or restrict the use of heavy and the significant commuter traffic to those more suitable A roads.

We therefore respectfully request that this appeal is not granted.

