

Planning Department  
East Northamptonshire Council  
Cedar Drive  
Thrapston  
Northamptonshire NN14 4LZ

26 March 2019

Dear Sir/Madam

**Ref: Planning Application 18/01284/FUL**

I am writing on behalf of Compassion in World Farming, the world's leading farm animal welfare organisation, to register our objection to the above planning application and to add further comments following the additional information that has been submitted by the applicant.

I request that this letter, with its additional points, be considered in addition to Compassion's previous letter.

The re-submitted plans propose the building of a six-shed factory farm, housing 314,000 chickens at any one time, with an annual flock of around 2,339,000. Information in the application indicates this venture will be raising chickens in intensive conditions, with high stocking densities and fast growth rates. It is imperative that this application is rejected for the following reasons:

**Scale and System**

This will be a large factory farm. The system inside the sheds will be intensive, with over 50,000 chickens housed together inside each shed. The chickens will be grown as fast as possible at a stocking rate of 22 birds per square metre, at great risk to their health and welfare. The basic planning issue is that this type of farm puts unsustainable demands on the environment and local area.

Paragraph 170 of the government's National Planning Policy Framework (NPPF) 2018 states that:

*'19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.'* This scheme, due to its highly intensive nature, is dependent on large inputs of human-edible food, energy and water, and as such is highly unsustainable.

Countless reports show the detrimental impacts of intensive farming on a whole range of measures including human health, rural livelihoods and the environment, as well as the obvious impact on animal welfare. Furthermore, feed for farmed livestock is highly dependent on imported, unsustainable commodities, such as soya and palm, which come from areas of high deforestation risk. For example, over 90% of the 3.8 million tonnes of soya imported to the UK each year is used in

livestock feed, and the vast majority of this goes into the feed of meat chickens.<sup>1,2</sup> Not only is this devastating to the environment and unsustainable, it also wastes huge amounts of food that could be fed directly to people.

In January 2019, the EAT-Lancet Commission on Food, Planet, Health published a report by more than 30 world-leading scientists from across the globe to reach a scientific consensus defining a healthy and sustainable diet.<sup>3</sup> The report highlights the high environmental footprint of animal-based foods and the subsequent impact on greenhouse gas emissions, land use and biodiversity loss, noting that this is particularly the case for grain fed livestock (broiler feed is heavily grain-dependent). The recommendations urge that current high meat and dairy consumption must be reduced, and instead should be produced and consumed in small proportions, for the sake of environmental and human health.

In their proposal, the applicant outlines 'The Need for the Scheme' citing the unprecedented growth in chicken consumption and the need for new, intensive developments in order to continue to supply large quantities of low-cost meat to consumers. This is contrary to the pressing need for a change in dietary patterns in order to address urgent population health and environmental issues. It is indeed the development of ever more intensive chicken farming systems that has enabled such over consumption, and it is these very systems which need to be curtailed for a sustainable future.

Governments are being urged by the United Nations Environment Programme to reduce overall meat consumption in order to benefit human health and address pressing environmental issues.<sup>4</sup>

The applicant refers to the employment generated by this development. Due to the intensive nature of the farm, despite housing over 300,000 chickens at any one time, the entire operation will only create five full time jobs. By contrast, chicken farms of a more moderate scale, using less intensive and more sustainable farming practices, generate many more jobs than this, and as such are far more beneficial to the rural economy. A £6.23 million capital investment in the local area could be far better used to serve the local community and economy than the provision of only five jobs.

Approval of this farm would be a clear choice by East Northamptonshire Council that you support and promote the spread of unsustainable factory farming in the UK.

Please also note additional planning implications below.

### **Litter, Ammonia and Nitrous Oxide**

The litter inside chicken sheds remains in place through the cycle of growing each batch of birds. This allows manure to build up from the first to the last day. With 314,000 birds on site at any one time, the volumes of manure will be very significant. As chicken manure decomposes it releases ammonia, a skin and respiratory irritant. Ammonia has a strong odour which will impact on the local air quality.

---

<sup>1</sup> UK Roundtable on Sustainable Soya: Baseline study 2018 <http://www.efeca.com/wp-content/uploads/2018/11/UK-RT-on-Sustainable-Soya-baseline-report-Oct-2018.pdf>

<sup>2</sup> The Soy Reporting Initiative 2017 <https://www.idhsustainabletrade.com/uploaded/2017/06/Soy-reporting-initiative-Final-IDH-Report-May-2017.pdf>

<sup>3</sup> EAT-Lancet Commission 2019. <https://eatforum.org/eat-lancet-commission/>

<sup>4</sup> United Nations Environment Programme, 2019. <https://www.unenvironment.org/resources/global-environment-outlook-6>

In addition the decomposing manure, and high concentration of animals, will certainly attract flies in large numbers.

Animal manure, including chicken manure is a source of nitrous oxide, which is a significant greenhouse gas.

### **Light Pollution**

It is not clear from the plans whether the poultry sheds will have windows. In fact, the applicant's response to concerns over light pollution states that "Most of the buildings do not have skylights or windows".

The majority of UK chicken is reared to a minimum standard of Red Tractor Assurance. From 2020, Red Tractor Broiler Standards will require windows in all sheds to a minimum of 3% of the floor area.<sup>5</sup> If not already included, and unless this farm will operate below Red Tractor Standards, windows are likely to be retrofitted, which may not require planning permission, but would affect light pollution.

### **Antibiotics**

The health of chickens in factory farms has traditionally been supported by the preventative use of antibiotics. Although welcome efforts have been made in recent years to reduce levels of use in poultry farming, highly intensive systems, such as the one in this proposal, are still far too reliant on antibiotic treatment.

There is clear evidence that the over use of antibiotics in factory farms contributes to resistance to antibiotics in humans. There is also evidence of high levels of antibiotic-resistant bacteria in the areas surrounding factory farms<sup>6</sup>, with bacteria spread through manure or carried airborne through ventilation systems.

Requirement for antibiotic use is affected by the intensity of the system. In the Netherlands, a third of farms rear slower growing chickens and these use less than half the antibiotics that intensive fast-growing chicken breeds do. By contrast, this application implies the use of fast-growing breeds (birds are to be reared for approximately 38 days which is consistent with fast growth; slower growing birds would normally be reared for 49 days or more) and is therefore more likely to require antibiotic use, with no commitment given by the applicant to limit antibiotic use in consideration of the local area.

---

<sup>5</sup> [https://assurance.redtractor.org.uk/contentfiles/Farmers-6941.pdf?\\_=636669856339249334](https://assurance.redtractor.org.uk/contentfiles/Farmers-6941.pdf?_=636669856339249334)

<sup>6</sup> Blaak, H., van Hoek, A.H., Hamidjaja, R.A., van der Plaats, R.Q., Kerkhof-de Heer, L., de Roda Husman, A.M. and Schets, F.M., 2015. Distribution, numbers, and diversity of ESBL-producing *E. coli* in the poultry farm environment. *PLoS One*, 10(8), p.e0135402.

## Disease

In their environmental statement of June 2018, the applicant states that “These conditions promote the raising of broiler chickens in safe, supervised conditions, free from predators, losses to adverse weather and threats of contamination such as avian influenza (‘bird flu’) from wild birds.”

With regards to avian influenza (AI), this is not correct. A European Food Safety Authority-commissioned report in 2017 analysed outbreaks of avian influenza across Europe and concluded that “These data do not provide a strong indication of free-range (outdoor) farming as an indirect risk for introduction of avian influenza, in particular for Gallinaceous (turkeys and chickens) species.”<sup>7</sup> Indeed, of all commercial cases of AI in the last outbreak in the UK (HPAI H5N8 2016/17), none of them were in *outdoor* commercial broiler or laying hen flocks (in which risk of contact with wild birds is much greater). Instead, all cases that occurred in commercial flocks of chickens, turkeys or laying hens, were in *indoor* flocks. Furthermore, in both the 2006/07 and 2016/17 outbreaks, indoor commercial poultry farms were the first hit. This demonstrates that housing birds indoors does not protect them from contamination with avian influenza, and in fact, evidence suggests that intensive indoor production of poultry may increase the risk of new highly pathogenic strains of AI evolving, meaning that this approach actually increases the threat posed by avian influenza in the long term.<sup>8,9</sup>

DEFRA’s information on avian influenza:

### ‘How avian influenza is spread

The disease spreads from bird to bird by direct contact or through contaminated body fluids and faeces. It can also be spread by contaminated feed and water or by dirty vehicles, clothing and footwear.

The avian influenza virus changes frequently, creating new strains, and there is a constant risk that one of the new strains may spread easily among people. But there is no evidence that any recent strain of avian influenza has been able to spread directly between people.

Avian influenza is not an airborne disease.’<sup>10</sup>

As this development proposes to keep more than 50,000 birds tightly packed into a single building at the highest possible stocking rate of 22 birds per m<sup>2</sup> (less space than an A4 sheet of paper per bird), it will provide the ideal conditions for viruses to pass from bird to bird, and in doing so, to mutate into new, and more pathogenic strains.

---

<sup>7</sup> Gonzales, J.L., Elbers, A.R.W. and Beerens, N., 2017. Risk factors of primary introduction of highly pathogenic and low pathogenic avian influenza virus into European poultry holdings, considering at least material contaminated by wild birds and contact with wild birds. *EFSA Supporting Publications*, 14(10). <http://onlinelibrary.wiley.com/doi/10.2903/sp.efsa.2017.EN-1282/pdf>

<sup>8</sup> FAO 2010, FAO EMPRES Wildlife Unit Fact Sheet: Wildlife and H5N1 HPAI - Current Knowledge. <http://www.fao.org/docrep/013/ak782e/ak782e00.pdf>

<sup>9</sup> APHA 2015. Highly Pathogenic Avian Influenza H7N7. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/469948/ai-epi-report-july-2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/469948/ai-epi-report-july-2015.pdf)

<sup>10</sup> <https://www.gov.uk/guidance/avian-influenza-bird-flu#latest-situation>

## Health and Welfare

Although welfare is not always considered in planning applications, it is a significant concern here because of the scale and intensity of the proposed system. The new application acknowledges this by its discussion of animal welfare and government codes, but the application fails adequately to address the issues that it raises.

Good animal welfare depends on three components: physical well-being, mental well-being, and the ability to perform natural behaviours. In intensive chicken farms all three of these are compromised by overcrowding in filthy conditions (the application states that the litter will not be changed at all during the lifetime of each batch of chickens), barren environments, and rapid growth.

All the indications are that this is planned to be an intensive system – stocking densities are very high; killing at 38 days suggests that intensive fast-growing breeds will be used.

Fast-growing breeds of chickens have been selectively bred to grow bigger and faster. There are huge health and welfare costs to this increased growth rate. They spend much of their time lying down because their legs are not strong enough to support their heavy body weights and many of them suffer from painful leg disorders. By the age of five to six weeks old, many can no longer walk or even stand up. The rapid growth also puts a strain on their hearts and lungs and they suffer from fatigue. Fast-growing broilers spend less time performing natural behaviours such as walking, pecking etc. than slower-growing breeds. In the UK alone, millions of chickens die in their sheds from heart attacks each year. Chickens bred to grow fast often develop leg deformities because their bones don't grow quickly enough to support the weight of their bodies.

This application would house chickens at a high stocking density, resulting in overcrowding. Chickens in overcrowded sheds have very little space for exercise and are disturbed or trodden on when they are resting. As they grow, they have less and less space to move and find it more difficult to reach food and drink if they are lame. Crowding is also likely to lead to more air pollution, increased heat stress and foul litter.

The air can become highly polluted with ammonia from the manure (see 'litter' above). This can damage the chickens' eyes and respiratory systems and can cause painful burns on their legs, chests and feet. Chickens confined in these barren sheds are not able to adjust their environment to avoid heat, cold or dirt as they would in natural conditions. Temperatures can become high in the sheds, especially in summer. If the ventilation system fails, thousands of birds can die of heat stress.

The application refers to animal welfare and the "Five Freedoms" which the system should be able to provide for:

- Freedom from hunger and thirst
- Freedom from discomfort
- Freedom from pain, injury or disease
- Freedom to express normal behaviour
- Freedom from fear and distress

Intensive systems such as that proposed are intrinsically unable to meet many of these requirements.

## Summary

This application is for a factory farm of a scale which is significant in UK farming. Factory farming has catastrophic impacts for people, the planet and animals; specifically, this proposal poses risks of air quality deterioration, increased greenhouse gases, increased risk for development of high pathogenic avian influenza viruses and the spread of antibiotic resistance in the surrounding area, as well as being an unsustainable venture that will offer negligible benefit to the local rural economy. It is the wrong direction for farming locally, nationally and globally. I urge you to reject this application.

Yours sincerely,



Dr Nick Palmer

Head of Compassion in World Farming UK