

12th September 2019



River Court, Mill Lane, Godalming, GU7 1EZ, UK
T: +44 (0)1483 521 950 Email: compassion@ciwf.org

District Council Offices
Kesteven Street
Sleaford
Lincs
NG34 7EF

Dear Sir/Madam

Ref: Objection to Planning Application Reference 19/1085/FUL by Compassion in World Farming

I am writing on behalf of Compassion in World Farming (Compassion), the world's leading farm animal welfare charity, regarding the above application. I request that you seek clarification that the proposed farm would meet the requirements of UK and EU legislation. If it does not, I urge you to oppose this application since, whilst welfare is often not considered a planning matter, compliance with legislation is.

Compassion supports high welfare pig farming but is concerned that many new farm developments fail to meet both the welfare needs of pigs and the requirements of national and EU legislation. As you assess the proposal, I would therefore be grateful if you could seek clarification that the proposed farm would meet the requirements of UK and EU legislation and that you publish any further information you receive on your website, along with the planning application.

From the information provided in the application, it would appear that the farm will not be able to meet UK legal requirements to provide manipulable material for pigs in order to prevent tail biting.

Pigs are intelligent and curious animals with a strong need to explore their environment. EU Council Directive 2008/120 laying down Minimum Standards for the Protection of Pigs, reflected in Welfare of Farmed Animals (England) Regulations 2007, requires pigs to be given manipulable material so that they can fulfil this need, for example, by the provision of suitable material in which they can root around and which they can manipulate with their highly sensitive snouts. The manipulable materials include those such as; "straw, hay, wood, sawdust, mushroom compost, peat or a mixture of such, which does not compromise the health of the animals."

In a barren unit with insufficient foraging material to occupy them, the interest of the growing piglets is redirected to their fellow pigs, and in particular to their tails. These they will manipulate, chew and bite, causing pain and distress. Tail biting is thus a severe welfare problem and is an economic issue for farmers. In order to try to prevent this, part of the tail of new-born piglets is sliced off, usually without anaesthetic or pain relief. Tail docking causes immediate and potential long-term chronic pain.

In light of the pain associated with the practice, both EU legislation¹ and The Welfare of Farmed Animals (England) (Amendment) Regulations 2003 state that piglets' tails must not be routinely docked. Before tails may be docked the environment must first be changed to ensure adequate conditions, which would include the provision of manipulable materials.

The documents provided in support of this planning application make no mention of straw and seem to suggest that the new development will not meet the legal requirement for the provision of this or other manipulable materials for enrichment, which are essential for the well-being of pigs. The Design and Access statement refers to fully slatted floors and a slurry-based system. Slatted floors make the provision of manipulable materials difficult. This is because straw and other materials can block the gaps in the slats and most slurry systems are not designed to deal with straw.

This is likely to make it difficult or impossible to allow for the adequate provision of manipulable materials, mainly since most slurry piping systems are easily blocked by such material. Considerable quantities of materials such as straw are required to sustain the interest of pigs sufficiently to avoid tail biting.

Therefore, running a farm using a slatted system, or a slurry piping system that cannot deal with required manipulable material, may well lead to multiple breach of EU regulations which are also part of UK law. There is a risk of creating future difficulties for the farm, its employees and the council if the farm proposal is designed from the start in a way which makes the provision of sufficient manipulable material to prevent tail-biting impossible.

Please also note the additional planning implications below.

Scale and System

The information provided in the planning application indicates that the pig farm will be operating an intensive indoor system, with little regard for the promotion of welfare or the pigs' natural behaviours. This is not the direction in which British farming should be embarking.

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.'*² This system, 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.

In their proposal Design and Access Statement. the applicant cites the need to diversify to a more sustainable operation. To intensively farm pigs at the levels that the applicant cites is entirely unsustainable and contrary to urgent pressure from intergovernmental environmental and food sustainability organisations.

Feed for farmed livestock is highly dependent on imported, unsustainable commodities, such as soya and palm, which come from areas of high deforestation risk. Over 90% of the 3.8 million tonnes of soya imported to the UK each year is used in livestock feed.³ 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 August 2019, a report of the Intergovernmental Panel on Climate Change (IPCC), stated that “producing animal-sourced food (i.e. meat and dairy) emits larger amount of greenhouse gases than growing crops, especially in intensive, industrial livestock systems.”⁴ The report stresses that for urgent environmental reasons, nations need to drastically reduce meat consumption. *Debra Roberts, Co-Chair of IPCC Working Group II said, “Balanced diets featuring plant-based foods, such as coarse grains, legumes, fruits and vegetables, and animal-sourced food produced sustainably in low greenhouse gas emission systems, present major opportunities for adaptation to and limiting climate change.”*

In January 2019, the EAT-Lancet Commission on Food, Planet, and 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.⁵ 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. 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.

As section 2 of the NPPF states: ‘The purpose of the planning system is to contribute to the achievement of sustainable development.’ The expansion of highly intensive pig meat production is an unsustainable development economically, socially and environmentally. Approval of this application would be a major step backward for animal welfare and the reputation of British farming.

Ammonia and Nitrous Oxide

This proposal will produce very large quantities of slurry, thus emitting ammonia and subsequent nitrous oxide, a potent greenhouse gas.

As Defra quotes in its 2018 Clean Air Strategy: “*The agriculture sector accounts for 88% of UK emissions of ammonia, which is emitted during storage and spreading of manures and slurries and from the application of inorganic fertilisers. Ammonia damages sensitive natural habitats and contributes to particulate pollution in urban areas.*”⁶

Emissions of ammonia are environmentally harmful, damaging habitats such as woodlands, heaths and lakes and contributing to acidification of agricultural soils and the eutrophication of waterways. Ammonia reacts with other compounds in the air to form secondary particulate matter, which significantly impacts on human health. Visually, ammonia contributes to smog in urban areas.

The negative and wide-ranging impacts of ammonia emissions has led the government to aim to reduce emissions of ammonia against the 2005 baseline by 16% by 2030.⁶

The Design & Access Statement of the application indicates that the building will operate on a fully slatted, slurry-based system. Numerous studies have found that fully slatted floor systems produce greater levels of ammonia than a partially slatted floor system⁷.

Disease and antibiotics

The pig sector is the highest user of antibiotics in UK agriculture⁸. Despite this high antibiotic use, the pig industry suffers from several endemic diseases including respiratory, diarrhoeal, lameness and mastitis disease.⁸ A report by the Parliamentary office of Science and Technology cites the intensive nature of the sector, with the use of intensive systems such as the one in this proposal, as a key factor in the higher risk of infection.⁸ Animal crowding, temperature and ventilation control, and stress all have an impact on the ability of animals to resist disease.⁹

There is clear evidence that the over-use of antibiotics in factory farms contributes to resistance to antibiotics in humans. A 2012 review addressing the use of antibiotics in food animals concluded that it is “critical that agricultural use of antibiotics be recognized as one of the major contributors to the development of resistant organisms that result in life-threatening human infections”¹⁰.

This application makes no reference to a commitment by the applicants to limit antibiotic use in consideration of the local area.

Health and Welfare

Although welfare is not always considered relevant in planning applications, we believe it is a significant concern here because of the scale and intensity of the proposed system.

Good animal welfare depends on three components: physical well-being, mental well-being, and the ability to perform natural behaviours. In intensive pig farms, all three of these are compromised by high stocking densities, a barren environment and no access to the outdoors.

Good animal welfare practice should deliver the “Five Freedoms”:

- 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. For example:

1. Crowded conditions cause discomfort and restrict the ability to express normal behaviour.
2. No access to pasture or deep bedding restricts pigs’ ability to exhibit natural behaviours, such as rooting and foraging, and prevents comfortable resting.
3. Slatted floors cause higher frequency of foot and leg injuries compared to solid flooring.¹¹
4. Decreased ability of pigs to resist disease as a result of factors such as animal crowding and higher stress levels.¹²
5. Systems without enrichment, like that proposed in this planning application, have increased incidences of tail biting, aggression and cannibalism, resulting in higher levels of stress hormones and injuries caused by fighting.^{13,14}

Summary

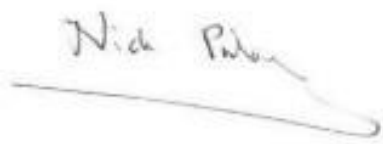
Factory farming has catastrophic impacts for people, the planet and animals. Specifically, this proposal poses risks of air quality deterioration, increased greenhouse gases, as well as being an unsustainable venture that will offer negligible benefit to the local rural economy. It is the wrong direction for farming locally, nationally and globally and as such, I urge you to reject this application.

The benefits of a higher-welfare, non-intensive system include, but are not limited to; an improved working environment for employees; a greater number of job opportunities; reduced pollution levels; reduced incidences of health and welfare problems among the animals. The UK needs farms which help to drive better welfare in the industry and provide consumers with a product not only better for human health, but also for animal welfare and the environment. If the plans were to be resubmitted, representing a change to an enriched, higher-welfare system, Compassion in World Farming would not object.

I also enclose an updated document that provides technical information on higher welfare pig farming in relation to planning applications.

I look forward to your reply.

Yours sincerely

A handwritten signature in blue ink that reads "Nick Palmer". The signature is written in a cursive style and is underlined with a single horizontal line.

Dr Nick Palmer
Head of Compassion UK
Compassion in World Farming
River Court, Mill Lane, Godalming, GU7 1EZ
E. compassion@ciwf.org T: 01483 521 950

PS It should be noted that the EU is taking urgent action to enforce compliance with the legislation requiring the provision of manipulable material and the provision of environments which facilitate avoiding the illegal application of routine tail-docking of pigs. The UK is listed amongst the Member States which is not currently compliant with the legislation. All the Member States have been given three years to produce plans which will achieve compliance.

Whilst the UK is currently leaving the EU, it seems likely that we will need to enforce this legislation much more rigorously. This seems, therefore, a bad time for farmers to be applying to build systems which do not have the potential for achieving compliance with pig welfare legislation.

References

¹ Council Directive 2008/120

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

³ 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>

⁴ IPCC 2019: *Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystem*

⁵ EAT-Lancet Commission 2019. <https://eatforum.org/eat-lancet-commission/>

⁶ <https://www.gov.uk/government/publications/clean-air-strategy-2019/clean-air-strategy-2019-executive-summary>

⁷ Philippe, F., Cabaraux, J. and Nicks, B. (2011). Ammonia emissions from pig houses: Influencing factors and mitigation techniques. *Agriculture, Ecosystems & Environment*, 141(3-4), pp.245-260.

⁸ Houses of Parliament Parliamentary Office of Science and Technology Post Note 588, September 2018

⁹ Gilchrist, M. J., Greko, C. et al. (2007) The potential role of concentrated animal feeding operations in infectious disease epidemics and antibiotic resistance. *Environ Health Perspect*, 115(2): 313-316.

¹⁰ Landers, T., Cohen, B., Wittum, T. and Larson, E. (2012). A Review of Antibiotic Use in Food Animals: Perspective, Policy, and Potential. *Public Health Reports*, 127(1), pp.4-22.

¹¹ The EFSA Journal (2005) 268, 1-19 The welfare of weaners and rearing pigs: effects of different space allowances and floor types

¹² Gilchrist, M. J., Greko, C. et al. (2007) The potential role of concentrated animal feeding operations in infectious disease epidemics and antibiotic resistance. *Environ Health Perspect*, 115(2): 313-316.

¹³ Mkwanzazi, M., Ncobela, C., Kanengoni, A. and Chimonyo, M. (2019). Effects of environmental enrichment on behaviour, physiology and performance of pigs — A review. *Asian-Australasian Journal of Animal Sciences*, 32(1), pp.1-13.

¹⁴ Arey, D. and Brooke, P. (2006). *Animal welfare aspects of good agricultural practice*. Petersfield, Hampshire: Compassion in World Farming Trust.