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7th September 2021

Planning Department
North Northamptonshire Council - East Northamptonshire Area
Cedar Drive
Thrapston
Northamptonshire
NN14 4LZ

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 confirm and update our objection to the above planning application in light of additional information that has been submitted by the applicant this year.

The updated documents and additional information added to this application do not appear to have addressed our objections. As such, I request that this objection letter be considered in addition to Compassion's previous comments.

The plans propose the erection of 6 poultry barns, housing 314,000 chickens at any one time, representing a total annual flock of around 2,339,000 birds. 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 information provided in the planning application indicates that the system inside the sheds will be intensive, with over 50,000 birds housed together inside each shed. The birds will be grown as fast as possible at a stocking rate of 22 birds per square metre and little regard for the promotion of welfare or their natural behaviours. This is not the direction in which British farming should be embarking and this type of farm puts unsustainable demands on the environment and the 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.[1]' This farm, due to its highly intensive nature, is dependent on large inputs of human-edible food, energy and water, and as such is highly unsustainable.

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

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 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.

To attempt to farm intensive poultry at the levels that the applicant cites, is entirely unsustainable, and contrary to urgent pressure from intergovernmental environmental and food sustainability organisations. In their 2019 report, the United Nations Environment Programme urges governments to reduce overall meat consumption in order to benefit human health and pressing environmental issues.[2]

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*."[3] 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."*

The arguments that the applicant puts forward, regarding a need for greater intensive poultry production, are outdated, unsustainable, and at odds with all urgent recommendations from leading global, national and local environmental and sustainability bodies.

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, and a very high proportion of this goes into the feed of meat chickens.[4,5] 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.[6] 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-

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[2] United Nations Environment Programme, 2019. https://www.unenvironment.org/resources/global-environment-outlook-6

[3] 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

[4] 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

[5] The Soy Reporting Initiative 2017 https://www.idhsustainabletrade.com/uploaded/2017/06/Soy-reporting-initiative-Final-IDH-Report-May-2017.pdf

[6] EAT-Lancet Commission 2019. https://eatforum.org/eat-lancet-commission/

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.

The applicant also refers to the employment generated by this development. Due to the intensive nature of the farm, despite housing 300,000 chickens at any one time, the operation will only create 5 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. The capital investment in the local area could be far better used to serve the local community and economy than the provision of a small number of jobs.

As Section 2 of the NPPF states: '*The purpose of the planning system is to contribute to the achievement of sustainable development.'* Expansion of highly intensive poultry production is an unsustainable development economically, socially and environmentally. Approval of this farm would be a clear choice by North Northamptonshire Council to support and promote the spread of unsustainable factory farming in the UK.

Litter, Ammonia and Nitrous Oxide

The litter inside chicken sheds remains in place throughout the cycle of growing of each batch of birds. This allows manure to build up from the first to the last day of the growing cycle. 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. In addition, the decomposing manure, and high concentration of animals, will certainly attract flies in large numbers.

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*."[7]

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]

Furthermore, 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 the "*It helps that most of the buildings do not have skylights or windows".*

[7] https://www.gov.uk/government/publications/clean-air-strategy-2019/clean-air-strategy-2019-executive-summary

The majority of UK chicken is reared to a minimum standard of Red Tractor Assurance. From, 2020, Red Tractor Broiler Standards have required windows in all sheds to a minimum of 3% of the floor area[8]. 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[9], 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, the one third of farms which rear slower-growing chickens use less than half the antibiotics applied for intensively farmed, fast-growing breeds. This is presumably due to a combination of reduced stress and stronger immune systems. By contrast, this application implies the use of fast-growing breeds (they state that birds are likely 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). Though routine use of antibiotics is no longer normal practice in the poultry industry, they are therefore likely to require use of antibiotic on some flocks, with no commitment given by the applicants to limit antibiotic use in consideration of the local area.

Disease

Avian flu outbreaks are a sadly common story in the UK. There is a clear likelihood that that the large-scale poultry industry has upset the longstanding balance between bird flu viruses and birds, wild or domestic. High Pathogenic variants of avian flu are a creation of the industrial-scale poultry industry that transformed relatively harmless Low Pathogenic avian flu into a lethal disease. The overcrowding, poor health, and high stress environments inside a factory farm are the perfect conditions for viruses to mutate.

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 influence ('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)*

[8] Red Tractor Poultry Guidance – Windows and Enrichment: https://assurance.redtractor.org.uk/contentfiles/Farmers-6941.pdf?_=636669856339249334

[9] 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.

species."[10] 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.[11,12]

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.'[13]

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^2 (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.

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. The application acknowledges this by its discussion of animal welfare and government codes, but it still fails to adequately 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

[10] 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

[11] FAO 2010, FAO EMPRES Wildlife Unit Fact Sheet: Wildlife and H5N1 HPAI - Current Knowledge. http://www.fao.org/docrep/013/ak782e/ak782e00.pdf

[12] 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

[13] https://www.gov.uk/guidance/avian-influenza-bird-flu#latest-situation

by very high stocking densities in filthy conditions (the applications 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 – the space allowance in relations to numbers of chickens produced suggests extremely high stocking densities; killing at 38 days suggests that intensive fast-growing breeds will be used.

Intensively reared chickens have been bred over the last few decades to grow very quickly. There are huge 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 lameness and painful leg disorders. The rapid growth also puts a strain on their hearts and lungs, and they suffer from breathlessness and fatigue. In the UK alone, millions of chickens die in their sheds from heart attacks each year.

As mentioned above, this application would house chickens at a high stocking density, resulting in overcrowding – with less than an A4 sheet of paper's space per bird. 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, especially 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 - called 'hock burns' - 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

From the detail provided in the application, this appears to be a large-scale, intensive broiler farm, with no evidence of higher welfare aspects such as slower growing breeds, lower stocking densities, or outdoor access. Intensive systems, such as that proposed, are intrinsically unable to meet many of these requirements and as such the applicant's statement misleading.

Summary

This application is for a factory farm of a scale which is significant in UK farming, raising 2,339,000 annually. 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 and as such, 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; a higher nutritional value in the meat produced; reduced requirement for antibiotic use and reduced incidence of health and welfare problems among the animals. If the plans were to be resubmitted, representing a change to a higher-welfare system, such as higher-welfare indoor or free-range, Compassion in World Farming would not object.

Yours sincerely,

Dr Nick Palmer

Head of Compassion in World Farming UK