**From:** Marie Barry <Marie.Barry@ciwf.org>
**Sent:** 30 May 2025 09:43
**To:** _planningadvice
**Cc:** Anthony Field; SET UK (Internal communication only)
**Subject:** RE: Planning Application H23-0313-25: Compassion In World Farming Objection
**Attachments:** Planning Application H23-0313-25 Compassion In World Farming Objection.docx



Dear Sir/Madam,

Please excuse the minor error in the spelling of 'Herefordshire' in Compassion In World Farming's objection to Planning Application H23-0313-25, sent last Friday 23rd May. Attached is our objection with the correction remedied.

Yours faithfully,
Marie Barry

**Marie Barry**
Senior Digital Campaigns Coordinator (UK) Mat. Cover



**From:** Marie Barry
**Sent:** 23 May 2025 16:35
**To:** planningadvice@sholland.gov.uk
**Cc:** Anthony Field <Anthony.Field@ciwf.org>; SET UK (Internal communication only) <SETUK@ciwf.org>
**Subject:** Planning Application H23-0313-25: Compassion In World Farming Objection

Dear Sir/Madam,

Please find attached a comment from Compassion In World Farming in relation to the Planning Application H23-0313-25. We are writing to formally register our objection to the planning application.

Yours faithfully,
Marie Barry

River Court, Mill Lane, Godalming, Surrey, GU7 1EZ
T: 01483 521 950 Email: anthony.field@ciwf.org

20 May 2025

South Holland District Council

Council Offices

Priory Road

Spalding

Lincolnshire PE11 2XE

Dear Sir/Madam

**Ref: Planning Application H23-0313-25**

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.

The plans propose the erection of 12 poultry barns, each housing 46,010 chickens at any one time, representing a total annual flock of 3,864,840 birds. Information in the application indicates this venture will be raising chickens in intensive conditions with fast growth rates and, importantly, they are asking for permission to keep 4,830,000 birds which would make it a highly intensive system. It is imperative that this application is rejected for the following reasons:

**Scale and System**

The total annual flock means it will be amongst the largest factory farms in the UK, also known as a 'megafarm'. While there is no official UK definition of a 'megafarm' Compassion defines one as a facility that meets the threshold of a US Concentrated Animal Feeding Operations (CAFO). The United States Department of Agriculture says a facility must have at least 125,000 broilers to be classified as a CAFO. This application exceeds that over fourfold by housing 552,120 broilers.

The information provided in the planning application indicates that the system inside the sheds will be intensive. Thinning the birds at 30 days means they have to use fast growing birds, which have health and welfare issues, in order to reach their required slaughter-weight. This is not the direction in which British farming should be embarking.

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. Approval of this farm would be a clear choice by South Holland District Council that you support and promote the spread of factory farming in the UK, which is not sustainable. This has significant planning implications.

Paragraph 11 of the Government's National Planning Policy Framework (NPPF) 2024 states that: *'Plans and decisions should apply a presumption in favour of sustainable development… all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change*

*(including by making effective use of land in urban areas) and adapt to its effects'.'*[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.

Policy 32 of the application's Environmental Statement states that, 'The growing of chicken helps support UK food security and self-sufficiency as a healthy food, general well-being'. 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. The United Nations Environment Programme found in their 2024 report that healthy diets with a low impact on the environment, 'included higher than average consumption of vegetables and lower consumption of meat' and that 'vegetarians tended to have lower [environmental] impacts and, despite some underconsumption of beneficial nutrients, a lower disease risk compared to the average population'. [2]

In 2022, a report from the Intergovernmental Panel on Climate Change (IPCC), stated that 'a transition towards more plant-based consumption and reduced consumption of animal-based foods … could reduce pressure on forests and land used for feed, support the preservation of biodiversity and planetary health'. The report stresses that for urgent environmental reasons, nations need to drastically reduce meat consumption. Indeed, 'the greatest Shift potential [to mitigate climate change] would come from switching to plant-based diets.'[3]

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 2021 the UK Government introduced new legislation in the Environment Act to tackle illegal deforestation in UK supply chains. It prohibits businesses from using illegally produced forest risk commodities, including both raw and derived products and requires that they establish a due diligence system for each regulated commodity. The applicant does not state what the broilers will be fed. We must therefore assume that imported soy will be part of their diet as poultry production consumes the majority of the 3.2 million tonnes of soy imported annually. There are concerns that soy production drives deforestation, contributing to climate change.

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-

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[1] National Planning Policy Framework, 2024: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf
[2] Global Resources Outlook. 2024: https://www.unep.org/resources/Global-Resource-Outlook-2024
[3] Climate Change 2022: Mitigation of Climate Change https://www.ipcc.ch/report/ar6/wg3
[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/

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.

The applicant also refers to the employment generated by this development. Due to the intensive nature of the farm, despite housing 46,010 chickens at any one time, the operation will only create 4 additional 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, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner'.*[7] Expansion of highly intensive poultry production is an unsustainable development economically, socially and environmentally.

**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 30 – 42 day growing cycle. With 550,120 birds on site at any one time, the volumes of manure will be very significant. According to the DEFRA commissioned Manures-GIS study, a broiler produces 21.4 kg of solid manure every year, therefore, considering the annual flock of 3,864,840, this farm would produce 8-9,000 tonnes of concentrated droppings every year,[8] assuming that 35% live for 30 days and 65% for 42. The total tonnage of waste to be disposed of will be much higher since it will be mixed up with their litter.

A recent High Court ruling in Herefordshire set a legal precedent by classifying chicken manure from large-scale poultry farms as industrial waste, due to its significant contribution to environmental damage, notably the severe pollution of the River Wye. The scale of poultry production in this application is on an industrial scale. The numbers of chickens produced requires industrial quantities of feed to be brought to the farm and the waste produced is equally on an industrial scale. In their State of our Rivers Report, The Nene River Trust found that, 'Along the Nene and its connecting brooks and dykes, all stretches were classified as either moderate, poor or bad ecological health. The biggest contributing sector to poor river health is agricultural and rural land management'.[9] Based on these findings and that factory farming in the River Nene catchment is already producing up to 280 tonnes of animal waste daily, creating over 3,400 tonnes of nutrient pollution ever year,[10] it is

[7] National Planning Policy Framework, 2024, https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf
[8] Nicholson, F.; Chambers, B.; Lord, E.; Bessey, R.; Misselbrook, T. (2016). Estimates of manure volumes by livestock type and land use for England and Wales. NERC Environmental Information Data Centre. https://doi.org/10.5285/517717f7-d044-42cf-a332-a257e0e80b5c
[9] Nene Rivers Trust, State of Our Rivers Report, 2024: https://neneriverstrust.org/the-state-of-our-rivers-report-2024/
[10] CIWF-UK (2024) Muck Map on website, viewed on 22/05/2025 https://www.ciwf.org.uk/our-campaigns/factory-farming-muck-map

vital that any new intensive poultry farm must require a detailed and transparent manure management plan. Without this, there is a serious risk of further damaging vulnerable ecosystems.

Furthermore, the River Nene flows into the Wash, a marine site designated as a Special Protection Area (SPA) and a Special Area of Conservation (SAC), highlighting its importance for wildlife and the need for its conservation. Farmed animal manure is high in nitrogen and phosphates and spread on field. As a result, soils in every region of England are now oversaturated with nitrogen.[11] Some of these nutrients are washed into rivers. The Wash could be impacted if the River Nene carried elevated nutrient levels as a result of this planning application being operational. The Wash Estuary Project has already identified agricultural runoff as a key threat, stating, 'Threats to the Wash: Pollution (e.g. from industrial run-off and nutrient enrichment from agricultural run-off) can have major detrimental effects. In particular nutrient enrichment may lead to eutrophication.'[12] Eutrophication is a process where excess nutrients in water bodies can cause algal growth in rivers, leading to algal blooms that starve plants of light. This further supports the need for a waste management plan that clearly shows how the additional nutrients produced by the proposed farm will not pollute the environment.

As chicken manure decomposes it releases ammonia, a skin and respiratory irritant. Ammonia has a strong odour which will impact the local air quality. In addition, the decomposing manure, and high concentration of animals, will certainly attract flies in large numbers.

Defra quotes in its Code of Good Agricultural Practice (COGAP) for Reducing Ammonia Emissions: '*Agriculture is the dominant source of ammonia emissions in the UK, with the sector accounting for around 88% of total UK emissions. Most ammonia comes from livestock manures in animal housing and stores, and when manures and nitrogen fertilisers are applied to land.*'[13]

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 and may put those at risk in the towns of South Holland district of Lincolnshire such as Spalding, Whaplode and Holbeach. A 2023 study found that long-term exposure to this particulate matter may account for 29,000 - 99,000 premature adult deaths each year.[14] Visually, ammonia also 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.

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

**Antibiotics**

[11]Soil nutrient balances England regions, 2020: https://www.gov.uk/government/statistics/soil-nutrient-balances-for-the-regions-of-england-2020/soil-nutrient-balances-england-regions-2020

[12] The Wash Biodiversity Action Plan, 2011: https://southeastlincslocalplan.org/media/24161/The-Wash-Biodiversity-Action-Plan/pdf/The_Wash_Biodiversity_Action_Plan.pdf

[13] Code of Good Agricultural Practice (COGAP) for Reducing Ammonia Emissions: https://www.gov.uk/government/publications/code-of-good-agricultural-practice-for-reducing-ammonia-emissions/code-of-good-agricultural-practice-cogap-for-reducing-ammonia-emissions

[14] Diagnosing domestic and transboundary sources of fine particulate matter (PM2.5) in UK cities using GEOS-Chem: https://www.sciencedirect.com/science/article/pii/S2590252023000028?ref=pdf_download&fr=RR-2&rr=94350a443db9b3b1

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[15], 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 farms which rear the slower-growing chickens required by the main supermarkets use between a third and a ninth of the antibiotics applied for intensively farmed, fast-growing breeds.[16] 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 30 - 42 days which is consistent with fast growth; slower growing birds would normally be reared for 42 - 49 days or more). At 30 days when the thinning is to be carried out, slower-growing birds would not have reached an appropriate slaughter weight. 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.

**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 chicken farms all three of these are compromised by very high stocking densities, barren environments, and rapid growth.

All the indications are that this is planned to be an intensive system; that 35% will be killed at day 30 suggests that intensive fast-growing breeds will be used in order for them to reach their slaughter weight within this time period. Although they are planning to use lower stocking densities in the immediate future, they are asking for permission to keep 4,830,000 birds per year which would involve intensively crowding the birds as they reach their slaughter weights.

The applicant claims that: 'the business will move adopt a higher welfare regime' despite the intention to keep fast-growing birds. 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 weight 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.

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[15] 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.

[16] Alliance to Save Our Antibiotics, 2024, How to end the misuse of antibiotics in farming. https://www.saveourantibiotics.org/media/2166/how-to-end-the-misuse-of-antibiotics-in-farming-full.pdf

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. Fast-growing birds are less heat-resilient, partly due to their high metabolism. Temperatures can become high in the sheds, especially in summer. If the ventilation system fails, thousands of birds can die of heat stress.

**Summary**

This application is for a factory farm of a scale which is significant in UK farming, raising 3,865,000 birds annually. Factory farming has catastrophic impacts for people, the planet and animals; specifically, this proposal poses risks of air quality deterioration, increased greenhouse gases and river pollution, increased demand for soya feed likely sourced from areas of high deforestation risk, 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, 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; a higher nutritional value in the meat produced; reduced requirement for antibiotic use and reduced incidence of health and welfare problems among the animals. Furthermore, the scale of poultry production in this application is on an industrial scale and should require a detailed and transparent manure management plan. As the planning application does not include this, it should be rejected until such time as the documents are in place to carry out a proper assessment of the impact of the farm. If the plans were to be resubmitted, representing a change to a higher-welfare system, such as higher-welfare indoor or free-range keeping slower growing birds at a guaranteed lower stocking density alongside a waste management plan, Compassion in World Farming would not object.

Yours sincerely,

Anthony Field

Head of Compassion In World Farming UK