

Tamsin Law  
Case Ref 19/0938/FUL  
Planning Services  
Powys County Hall  
Spa Road East  
Llandrindod Wells  
Powys, LD1 5LG

9<sup>th</sup> July 2019

Dear Sir/Madam,

**Ref: Planning Application 19/0938/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.

The plans propose the building of three chicken sheds, housing 150,000 chickens at any one time. Information in the application indicates this venture will be raising chickens in intensive conditions, with high stocking densities and fast growth rates. We suggest that Powys County Council challenges the applicants on the following issues:

**Scale and System**

This will be a large factory farm. Our enquiries show that the system inside the sheds will be intensive, with the chickens grown as fast as possible with little regard for the promotion of welfare or their natural behaviours. 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 animal welfare, human health, rural livelihoods and the environment. Approval of this farm would be a clear choice by Powys County Council that you support and promote the spread of factory farming in the UK.

**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 so many 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.

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

**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, antibiotics are still used in much larger quantities in intensive farms.

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>1</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, the third of farms which rear slower growing chickens use less than half the antibiotics used for intensive fast-growing breeds, 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 the 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 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.

## **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.

Broilers (chickens farmed for meat) have been selectively bred to grow bigger and faster. Chickens can live for six or more years under natural conditions. However, those used in intensive farming, like those covered by this application, will commonly be slaughtered before they reach six weeks old. Intensive systems are commonly barren except for water and food points.

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, barren environments, and rapid growth. Chickens also suffer injury and stress through rough handling during catching, transport and slaughter.

All the indications are that this is planned to be an intensive system – the space allowance of 7200m<sup>2</sup> in relation to the 150,000 chickens produced suggests high stocking densities of 20 birds per m<sup>2</sup>; killing at 42 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 painful leg disorders. 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 - 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.

Before transport to slaughter, broilers are usually deprived of food for many hours, leaving them stressed and hungry. Catching, crating and transport are stressful and can result in bruising and broken bones. Broilers are either caught by hand by a team of catchers, or are picked up using a catching machine.

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 towards the end of the rearing process cause discomfort and restrict the ability to express normal behaviour.
2. The consequences of fast growth can cause discomfort when lame birds lay down in the litter, exacerbating hock burns. The weak joints and heart conditions can cause pain and distress. Fatigue caused by chronic heart conditions and lameness can severely limit the ability to express a range of natural behaviours including perching and normal exercise.
3. Barren systems, for example the lack of perches and suitable pecking substrates, again restrict such natural behaviour.
4. The high levels of antibiotics still used, despite much progress to reduce their use, implies a high risk of disease. That systems in the Netherlands which use slower growing breeds use much lower levels of antibiotics provides further evidence of the intrinsic unsuitability of intensive chicken production systems to provide for acceptable health and welfare.

## **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 and the spread of antibiotic resistance in the surrounding area. It is the wrong direction for farming locally, nationally and globally. I urge you to reject this application.

Yours sincerely,

Nick Palmer

Dr Nick Palmer  
Head of Compassion in World Farming UK