



The countryside charity
Bedfordshire

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The Planning Department
North Northamptonshire Council
East Northamptonshire District
Cedar Drive
Thrapston
Northamptonshire
NN14 4LZ

26 September 2021

Dear Sir/Madam

Re: Planning Application 18/01284/FUL

Land North East Of Westwood AD Plant Bedford Road Rushden Northamptonshire
Intensive Broiler Chicken Factory for the production of 2.339million birds per year

Construction and operation of a broiler rearing unit with six linked poultry buildings and ancillary structures comprising fifteen grain silos, three crumb feed silos, three feed blending houses, two water tanks with an associated pump house, two gas storage tanks, an electricity substation, switch room and standby generator with fuel tank, a weigh room, a welfare block, a cold store and incinerator, a boiler house and storage building, a security gatehouse and associated hardstanding, with boundary fencing, landscape, planting and flood attenuation works and an upgrading of an existing vehicular access track extending to the south-west to an existing anaerobic digestion plant access road.
(revised scheme to 17/01328/FUL)

We refer to the above planning application which is located in Northamptonshire but very close to the Bedfordshire border.

We would not normally comment on an application in Northamptonshire but in our view, this very substantial development proposal is likely to seriously impact the residents of Bedford Borough.

We are objecting to the application for the following reasons:

1. The people of Bedford Borough have not been properly consulted on this important strategic application which could have serious impacts on communities in Bedford Borough.

Following notification by yourselves, the application was logged on the Bedford Borough Council (BBC) planning system on 27th August 2021 under Bedford Borough application no. 21/02360/LPA.

However, despite the very large scale and potential impact of the proposed Intensive Chicken Factory on the nearby Bedford Borough communities of Knotting, Knotting Green, Souldrop, Melchbourne, Wymington and Yelden, no effort was made by BBC to formally inform the relevant Parish Councils (PC) of the application until week commencing 20th September.

BBC notified these communities only at the request of CPRE Bedfordshire.

The Bedford Borough communities of Knotting, Knotting Green and Souldrop are probably the nearest communities to the site itself - nearer than most Northamptonshire communities.

You will note that this is at best just 7 days prior to the closure of your consultation period for this application on 27th September.

We have asked that BBC write to you to explain the situation and ask that you please offer additional time for these and other PC's in Bedford Borough to respond to the consultation. Unfortunately, at the time of writing BBC has refused to do this.

In our view, this application is of interest to many additional PC's in North Bedfordshire which are located near to the site of the proposed factory or to areas of land owned by the applicant Bedfordia, where it is intended that large amounts of manure from the factory farm will be distributed.

The Manure Management Plan raises the question of potential pollution of surrounding water courses and the Great River Ouse which would be of concern to PC's in the area.

This is just one area of potential concern, there are several others.

We have requested that BBC formally advise all PC's in the Borough of this strategic application but to date they have refused to do so.

PC's in Bedford Borough are not in the habit of scouring the "Weekly List" to find planning applications that could be of interest to their community.

Our view is therefore that, from the perspective of Parish Councils in Bedford Borough and the residents they represent, the consultation process is deeply flawed and has not been undertaken in an open and democratic manner.

2. Manure Management Plan and potential pollution of the River Great Ouse and the streams/ivers feeding it which could be increased due to Climate Change.
Increased air pollution.

Water Pollution

The map accompanying the applicant's Manure Management Plan indicates that the majority of the fields where the chicken manure will be spread are in Bedford Borough.

The fields stretch from the outskirts of Bedford itself north through the Parishes of Oakley, Milton Ernest, Radwell, Thurleigh, Bletsoe, Sharnbrook, Souldrop, Melchbourne and Riseley.

The majority of the land is located in the valley area of the River Great Ouse or in the valleys of tributaries feeding the Ouse.

The River Great Ouse and its valley area is an extremely important environmental feature on North Bedfordshire providing a vital source for drinking water and biodiversity.

It is estimated that the amount of manure generated by this enormous Chicken Factory will be of the order of 3,500 tonnes per year – a colossal amount!

This Manure Plan is in addition to the manuring already taking place on these same fields from the Bedfordia intensive pig farm which produces 28,000 pigs per year.

It is already known that intensive chicken factories elsewhere in the UK have caused very serious pollution of important river systems e.g. River Wye in Wales.

Climate Change will make this worse as we can expect many more torrential downpours of rain in the future which will wash nitrates from the manure into the watercourses and into underground water systems.

These downpours have already been experienced this year across much of the country.

The Manure Plans submitted with this application have not been independently stress-tested to take account of Climate Change.

The applicant states that they will wait for the ideal weather conditions before spreading the manure but these Climate change induced weather systems will not be easy to predict.

It is not acceptable for an applicant to produce their own Manure Plan without it being subjected to a stringent independent assessment.

Air Pollution

The issue of air pollution due the odour emitted from the manuring process.

Several gases (e.g. ammonia and nitrous oxide) are emitted from the decomposing process associate with chicken waste. These can cause air pollution which is both an irritant and strong smelling.

Already, the spreading of pig manure is the cause of strong smells and poor air quality across Bedfordia land during the manure spreading period and this additional chicken waste will make things much worse.

DEFRA already has a target to substantially reduce the emission of ammonia gas as part of its 2018 Clean Air Strategy.

Poor air quality and the associated bad smells will also be generated by the Intensive Chicken Factory itself, impacting local communities in Bedford Borough not just in the immediate vicinity but also at some distance from the Factory.

Intensive farming practices of this sort and scale should be avoided at all cost if we are to reduce these pollutants.

3. The proposed development does not conform to the governments stated objective in the NPPF (2021) - Chapter 2, para 7:

“The purpose of the planning system is to contribute to the achievement of sustainable development”

The proposed development of an Intensive Broiler Chicken Factory, producing a huge 2,339,000 birds per year, one of the largest factories of its type in the UK, will do nothing to achieve sustainable development.

The 2019 Report from 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..”

The intensive production of broiler chickens is therefore outdated and runs completely contrary to current thinking – we need to reduce our consumption of meats and particularly intensively reared animals.

This application is therefore unsustainable by any standard and on that basis alone should be refused.

4. Substantial additional HGV and Agricultural Tractor/Trailer traffic on the A6 and on the rural road network

We believe that the vehicle movement schedule included in Chapter 10 of the Environmental Statement substantially understates the number of HGV's and Agricultural Trailers that will enter and leave the site and also use the rural road network.

The estimated amount of manure alone, at around 3,500 tonnes per year, would require significantly more Tractor Trailer movements than the 40 per day over 2 days indicated in the report.

We are very concerned that the number of tractor trailer movement will seriously impact villages on the rural road network not just on the 2 days in each 49 day cycle but when added to the unknown number of movements due to pig manure delivery.

It is unlikely that the 40 movements over the 2 days identified will be sufficient to deposit the manure to its final location and several additional drops will be required.

HGV movements will add significantly to the already very congested A6 southbound.

As far as Bedford Borough is concerned there are already very serious issues regarding the A6 at Bedford and the roundabout junction with the Bedford "western by-pass". Current works to improve the situation are unlikely to make a major difference.

We would like to see an independent assessment of the applicants Transport Assessment and more detail of how precisely the manure will be transported to the individual fields.

Yours sincerely

Gerry Sansom
CPRE Bedfordshire