

Mr Adam Reynolds  
Mid Kent Planning Support  
Maidstone House  
King Street  
Maidstone  
ME15 6JQ

Objection to planned large scale egg farm: 20/505751/EIFUL

Dear Mr Reynolds,

I am writing to you to lodge a formal objection to the proposed construction of a new 'free-range' egg farm to be sited at Reed Court Farm, Hunton Road, Marden, Tonbridge, Kent, TN12 9SX (planning application number 20/505751/EIFUL)

Whilst I appreciate that animal welfare is not a planning consideration, I would like to draw your attention to the recent Animal Aid investigation into another unit operated by Fridays Ltd namely, 'Combwell Farm' where the group exposed some terrible conditions. Footage showed hens with extensive feather loss, injured birds and several dead and decomposing birds left among the living. Conditions were extremely dirty with heavy dust and faeces accumulating. A very small percentage of the birds were outside 'ranging' during the daytime, this may be attributed to crowding and social hierarchy which prevents birds accessing pop holes. Some hens may never range outside.

<https://www.youtube.com/watch?v=O7Ish7cMOXA&list=UUQU-2dlbbNDhtW7rHr3RG2g>

This unit is around a third the size of the new proposal, which would see upwards of 190,000 hens held across three vast 250m industrial 'sheds'. In light of this, we really must question whether the health and welfare of an even larger population of birds can possibly be effectively monitored generally or safeguarded in an emergency situation. And more widely question whether such huge scale, vertical farming with many thousands of hens, can really constitute 'free-range'.

Further to the animal welfare concerns, there are many other issues relevant to this proposal which should support a rejection of the plans:

The proposed site is within the floodplain of the River Beult, which is designated a Site of Special Scientific Interest (SSSI). The site is positioned well inside the impact risk zone (IRZ) for the river, and rainwater run-off from the site, or floodwaters which regularly cover the plain will inevitably flow back into the river. A chicken farm of this size will produce enormous amounts of faecal matter, much of which (potentially up to 60 tonnes per week) could be deposited on the outdoor ranging areas and from there into the river habitats. High volumes of nitrogen rich material draining into the Beult risk massive damage to a delicately balanced and unique river ecosystem already rich with nutrients from its course over the lowland Wealden Clays. The river supports a number of nationally scarce species, and feeds priority habitat zones alongside the river, such as the lowland fen just

downstream from the proposed site. The area is also inside a Drinking Water Safeguard Zone (Surface Water) and near to a Drinking Water Protected Area (Surface Water). This development could directly impact upon water quality which is at risk of failing the drinking water protection objectives.

I would like to flag this report from 2018 by the Environment Agency and Natural England which highlights a number of nationally rare species and habitats:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/734380/Improving the River Beult SSSI Non-Technical Summary.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734380/Improving_the_River_Beult_SSSI_Non-Technical_Summary.pdf)

I would also like to highlight the damage done to the River Wye by similar developments of poultry farms along the river as described in this article:

<https://www.theguardian.com/environment/2020/jun/20/its-like-pea-soup-poultry-farms-turn-wye-into-wildlife-death-trap>

The site itself supports a wide range of species as identified in the surveys already published and the proposed development and ongoing operation of this farm would have a devastating impact on these creatures. Most obviously the protected great crested newts which have been identified as living and breeding across the site and a range of rare and declining bird species which rely on the current arable land as a breeding and hunting range such as owls and other raptors, turtle doves, lapwings and grey partridges. The proposed development would divide the area with 2.5m chain-link fences and further deplete the biodiversity of the site to a near total monoculture, while introducing substantial disruptive noise and traffic which will effectively make this area completely unavailable to these important species.

There are plots of ancient woodland near to the site to the East and South East which are at risk of direct damage from pollution and drainage changes, but also are home to many species who rely on this open land access.

Human and bird health is another significant concern with a development of this sort. Particularly in the current environment, where we are suffering the effects of a global pandemic alongside a severe incursion of highly pathogenic avian influenza which has been killing wild birds and spreading amongst farmed bird flocks across the country, it is a massive risk to consider introducing an industrial chicken farm on such an enormous scale with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potentially to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

The proposals also implicate the development and operation of the farm in a significant uplift in traffic noise, pollution and disruption which will affect both local residents and wider transport routes, and which the current proposal does not address in appropriate detail. There is also concern that public rights of way currently traversing the site will be lost or re-routed in a manner that is unacceptable.

In light of the above, I urge you to reject this proposal.

Kind regards,

Name

Address