

Animal Aid
The Old Chapel
Bradford Street
Tonbridge, Kent
TN9 1AW
28th May 2021

FAO Mr Andrew Stock
Via email
Derbyshire Dales District Council
Town Hall, Bank Road
Matlock, Derbyshire
DE4 3NN

Application: 21/00130/FUL

Proposed development: Erection of rural workers' dwelling and agricultural/food production building.

Address: Land East Of Turlowfield Lane, Turlowfields Lane, Hognaston, DE6 1PZ

Case Officer: Andrew Stock

Animal Aid asks that a copy of this letter is made available to the whole Committee who have the task of assessing this application.

Dear Mr Stock,

I would be grateful if you could please accept this planning objection on behalf of Animal Aid. Please take the contents into account when considering application 21/00130/FUL. Considering the points raised below, we encourage you to refuse this application.

Firstly, we would like to mention that we would welcome the time when animal welfare would be a material consideration during the review of planning permission applications involving animals. Our objections to the application for further site development cover a-number-of areas.

Essentially, to our mind, this application is for a two-storey permanent brick three-bedroom house and rabbit slaughtering facility.

Does 'agricultural use' stretch to slaughtering?

- We do question whether 'agricultural use' can really stretch to include 'processing' i.e. slaughtering, which is a very significant development from the original permissions.
- Originally this site was on pastureland before permission was given to establish a tree-growing farm, before, step-by-step, a rabbit farm has materialised. May I remind you that the original application Ref. No: 11/00104/FUL for the erection of an agricultural barn for rabbit breeding and three polytunnels was refused and this has been circumvented by first a caravan and then a static prefab worker dwelling being approved.

Unconventional development plans

- It is becoming more and more challenging for this site to be returned to its original state and purpose, a wildlife haven and rich pasture. And we question whether this is just part of a series of moves by the applicant who has specific interests in development and real estate, to establish a bricks and mortar house, on prime open countryside where planning permission would not be granted by the more conventional process.
- The application involves the construction of a brick workers dwelling in the countryside, with very little other development around, detached from any definable settlement containing the necessary facilities to support day-to-day occupation. This would encourage the use of a private motor vehicle for access, which is not in the interests of sustainable development.

No obvious economic benefit to the local area

- The development would not bring obvious economic benefit to the local area and could actively reduce this. The modest associated economic benefits of this proposal do not outweigh the unsustainable location and harm to the natural qualities of the setting.

Visual harm

- The elevated buildings would create a significant eyesore in the immediate setting and surrounding natural environment in the open countryside, resulting in landscape and visual harm to the surrounding scenery.

Small scale supplier exemption and lack of official oversight

- The production cap of 10,000 rabbits per year, for 'small-scale suppliers' meeting the criteria listed below, means the applicant is exempt from the Food Standards Agency (FSA) rules for monitoring and reporting. Without FSA oversight with the presence of an Official Vet (OV) and CCTV monitoring in all areas where animals are present, there would be **no day-to-day oversight of animal welfare**, meat hygiene, food safety or safe waste disposal unlike a conventional slaughterhouse.
- We understand that the business would be required to register with the Local Authority (LA), who would be responsible for ensuring that the producer complies with applicable labelling, record keeping, food safety, and hygiene requirements. Many interested parties are likely to have an ongoing concern about these aspects as well rabbit welfare at the site and ensuring that animal welfare standards are monitored and upheld by the LA.
- This lack of both licensing and official oversight is especially concerning given the known issues with the electrical stunning of rabbits. Electrical stunning often does not render the animals fully unconscious and thus leads to pain, stress and suffering.

Defra 'Guidance on Slaughtering poultry, rabbits and hares on farms for small-scale suppliers'

When you're classed as a small-scale supplier

You're classed as a small-scale supplier **if all of these apply:**

1. you slaughter less than 10,000 birds, rabbits or hares per year on your farm
2. you supply the birds, rabbits or hares directly to the final consumer or to local shops
3. you supply meat within your own county and the adjoining counties (or no further than 50 kilometres from your county's border) It is stated in: 'T & S Nurseries, Atlow Planning Application for a rural worker's dwelling. Appraisal by Reading Agricultural Consultants.' That 'The progeny from the rabbit unit are reared mainly for meat and marketed to both local butchers and also **national suppliers**'

Can the planning department be certain that all of these conditions are being met and the rabbit meat product is not being supplied nationally or even internationally? Have full accounts signed by the accountant been inspected to ensure compliance?

Noise and disturbance

- Many people flock to the Carsington Water for walking excursions and there is a nearby caravan park to the site. Visitor experience could be marred by the presence of a rabbit fur and meat farm nearby.
- The killing and processing of animals and associated machinery will likely generate significant noise. The sound of forklift trucks, fans, fridges, freezers, etc would mar the tranquillity of the nearby open countryside.
- The use of a rifle as 'pest control' may present a significant safety issue to the public.

Storage, handling and disposal of waste materials

We have concerns about the storage and disposal of waste products associated with a high intensity livestock unit and slaughtering facility. This is not satisfactorily addressed in the application. How will animal waste and bodily remains produced during slaughtering be stored, treated and disposed of, and how will it be ensured that none of this waste will contaminate the surrounding area?

Smell and flies

Rabbits create a lot of waste and ammonia. The proposed slaughtering/ processing building would generate all manner of unpleasant noises, foul smell, and increased waste.

- The sound of screaming rabbits would be a cause of distress to anyone hearing it – potentially including children and vulnerable individuals.
- There is no mention, in the application, of how the rabbits will be slaughtered. It is stated there will be an 'intake and skinning area'. It is imperative to know whether the animals will be stunned prior to slaughter.

Public attitudes to rabbit meat and real fur

- We understand that fur would be produced as a 'by-product' which is highly distasteful and would be 'fur farming by the back door':
<http://www.tandsrabbits.co.uk/products.html>
- There is huge public sentiment against real fur in the UK. A recent YouGov poll by the Humane Society International revealed that the vast majority (93%) of people in Britain don't wear real animal fur and do support a #FurFreeBritain.

- There is little demand for rabbit meat in the UK, and most people are repulsed at the thought of consuming these creatures. Rabbits are mostly viewed culturally as companion animals or wild animals in the UK. They are the third most frequently kept pet in the UK.

The threat of disruption

- As rabbit farming is something which is frowned upon by many members of the public, the farm could attract protests and unwanted attention, disrupting local life.

Tourism and visitors

- Many people flock to Carsington Water for walking excursions. Visitor experience could be marred by the presence of a rabbit and meat farm nearby. This could mean people do not return, thereby causing economic harm.
- The use of a rifle as 'pest control' may present a significant safety problem to the public. These two points are already made under 'Noise and disturbance'

Special protections as confirmed by Magic.Map

- The area is a Site of Special Scientific Interest (SSSI)
- Priority Species including Lapwing, Willow Tit, Tree Sparrow have been found in the area
- The whole area is listed as a 'Farm Wildlife Package Area'
- Land-based schemes Higher Level Stewardship Themes

Rabbits as potential SARS-CoV-2 reservoirs

- 'A new study by scientists in the Netherlands and published on the preprint server bioRxiv* in August 2020 shows that the severe acute respiratory coronavirus-2 (SARS-CoV-2) can infect rabbits, which opens the door for possible circulation in rabbit farms and another potential source of animal-to-human SARS-CoV-2 infection.'
<https://www.news-medical.net/news/20200830/Rabbits-susceptible-to-SARS-CoV-2-Red-flag-for-potential-virus-reservoir.aspx> SARS-CoV-2 is the virus causing covid-19.
- The proposed type of farming is unacceptable especially during a pandemic caused by an animal-to-human virus along with new variants now emerging, and this should be taken into serious consideration. The fact that rabbits can be infected with covid could make this a reservoir for the virus.

Disease management

- There are no specific drugs licensed for use in 'meat' rabbits in the UK, due in large part to the lack of commercial rabbit farming here, so these animals intended for meat may well not be vaccinated, only the 'breeding animals' as they are not intended for meat production. There is also no mention of vaccinating the rabbits against the fatal, incurable diseases myxomatosis, VHD and VHD2. There is a concern that disease could pass between wild rabbits and unvaccinated 'captive' rabbits in the vicinity. These diseases are lethal and easily spread between rabbit populations. Many pet rabbits are vaccinated, but many are not, and there is no vaccination programme for wild rabbits.

- A report by Reading Agricultural Consultants titled 'T&S Nurseries T&S Rabbit Farms Lyndon Top Rural Worker's Temporary Dwelling Appraisal', and dated December 2020, states that *'Over the past year, or so, on two of the holdings (Granby and East Bridgford) there have been outbreaks of Rabbit haemorrhagic disease 1 and 2 (RHD) which causes sudden death to growers at 8-12 weeks of age, and adult stock. It is understood there is no treatment only vaccination.*
- There is a risk of outbreaks of coccidiosis if the rabbits are not circulated on range and the ground left fallow for suitable stretches of time. We question how this can be achieved with hundreds if not thousands of rabbits. We understand that it is unlikely that the faeces will even be collected but instead just be left to accumulate and rot into the ground.

Risk to adjacent farm

- There is an adjacent farm named 'Badger Moor Farm'. We wish to draw attention to the concerns for negative impacts upon this farm, relating to the potential impact of a bio-security breakdown of the rabbit farm development on the livelihood of this nearby farm through risk of contamination and disease.
- The application makes no mention of neighbours having been consulted. We understand that there appear to be four neighbouring properties nearby.

Disruption to local ecology

- There is also a concern for rabbits escaping into the local environment. Rabbits are exceptional diggers and could escape by tunnelling out.
- No ecological impact report has been conducted for the proposed site. Given the rural location, it is likely to be habitat for multiple animal and plant species, many of which may be endangered or otherwise protected. There is no information regarding protected species as provided by surveys. The application does not contain any information with regards to Biodiversity Net Gain.
- There has been no Management Plan submitted.
- The rabbit farm and slaughterhouse would continue to attract wildlife such as foxes and badgers, and possibly domestic dogs, threatening local conservation efforts. The 'management' of species such as foxes leads to even more cruelty. This document shows foxes that have been shot with rifles, which is not humane deterrence: 'T & S Nurseries, Atlow Planning Application for a rural worker's dwelling. Appraisal by Reading Agricultural Consultants.' It also states that 'they remain a constant threat'

2.8 Permanent fencing around the rabbit enclosure has been installed with weldmesh fencing buried 0.5m into the ground with electric fencing running around it at 0.5m and along the top (Figure 5). This has proved very effective at keeping foxes out of the enclosure although they remain a constant threat. Figure 6 shows four foxes that were shot one night using rifles and night-sights.

Figure 5: permanent fencing



Figure 6: fox kills



Traffic

- It is anticipated that there will be a significant increase in traffic with movements of feed, bedding, waste and live and dead animals.
- Residents report Turlow Fields Lane to be narrow with poor visibility.

Welfare

Animal Aid believe that no animal should be farmed for their fur or flesh. Additionally, it is known that rabbits are particularly unsuited to being farmed when compared with other animals who are regularly farmed. -The EFSA Journal (2005) 267, 1-31, "The Impact of the current housing and husbandry systems on the health and welfare of farmed domestic rabbits" states:

'Farmed rabbits are genetically not far removed from other rabbits used in laboratories or those in the wild and so their needs, the causes of poor welfare, and their susceptibility to disease is very similar. In particular, the Panel notes with some concern, that the mortality and morbidity of farmed rabbits seems considerably higher than in other farmed animal species due to enteric and respiratory infections, and reproductive problems. The breeding life of does is very short with more than 100% often being replaced each year.'

<https://efsa.onlinelibrary.wiley.com/doi/epdf/10.2903/j.efsa.2005.267>

I would like to draw your attention to some issues that our recent investigation into the Atlow/Hogstanton site highlighted. We discovered:

- Rabbits confined for hours on end in tiny barren hutches, unable to freely access grass.
- Animals being unable to bask in the sunshine, dig and play – or even to sit upright. A lack of being able to run, hop and play with others leads to immense physical and emotional suffering.
- Many large breed New Zealand Whites rabbits were barely able to stretch out or stand or rear up with ears upright.
- No changes when our investigators returned to the site on multiple occasions. The rabbits remained in the 47 hutches on stilts inside the wire pens, with around five hutches to each pen. Rabbits were seen sitting inside the hutches, but over the course of several visits the investigators did not see any of them out on the grass.

- Rabbits are crepuscular and are most active at dawn and dusk. They are denied any chance to enter or leave their hutches at will in the set-up that our investigators observed.
- Commenting on our findings, Vicky Bond, director of the Humane League and veterinary surgeon, said: “I wouldn’t say it was free-range. I think [Kerry] can say free range and people wouldn’t know what it means and just assume [the rabbits] have lots of space. They don’t have lots of space” - Vicky Bond, in a piece by freelance journalist Claire Hamlett: <https://www.surgeactivism.org/articles/why-the-public-is-right-to-object-to-proposed-free-range-rabbit-farms>

Please take a moment to watch a short piece of footage of our findings:

https://www.youtube.com/watch?v=cl_6EmwUWMY

Our findings are further reinforced by a report from Reading Agricultural Consultants entitled ‘T&S Nurseries T&S Rabbit Farms Lyndon Top Rural Worker’s Temporary Dwelling Appraisal’ which states that, regarding the disease outbreak, mentioned above, :
 4.10 *‘As such, this has prompted the introduction of new control systems, and closer attention to detail, with growing stock divided into smaller groups and more widely spread; and, all breeding stock are now vaccinated by unit managers. **Staff no longer access the grazing runs (to avoid cross contamination)** and hygiene measures akin to the Covid-19 requirements are enforced for all staff –with alcohol-based sanitisers and bleach solutions in use.’*

Given that our investigators saw no evidence of ramps attached to hutches during the investigation, we question how rabbits will be able to leave the hutches and access grass? How is hay and food topped up? Good practice would mean that rabbits also require regular physical health checks. How is this possible if staff never enter the runs?

- There are no effective species-specific regulations in place to guarantee even minimum enforceable standards for rabbits.
- Once the site with planning permissions is secured it appears the owner will then offer the site for sale. This advert states: ‘The seller will give the necessary training and support to the purchaser’ <https://www.onthemarket.com/details/4242960/>. This is highly concerning from the point of view of providing suitable care and attention for hundreds if not thousands of rabbits. Rabbits are a prey species, and therefore inclined to hide signs of illness if they are unwell. Because of this, rabbits can be extremely ill before those caring for them even notice. Without specific knowledge of rabbits, their health and illnesses, many animals may suffer in silence and die without medical intervention.

We have serious concerns about whether the rabbits will be afforded proper outdoor access

- Spayed female rabbits need to be very carefully introduced and bonded in pairs or small groups to avoid any territorial issues and fighting.
- Keeping two un-spayed females together, even if sisters, can lead to them being highly territorial and may lead to serious fighting and injury risk.
- Un-spayed females are at very high risk of developing uterine cancer and other uterine conditions which can prove fatal.
- Does become exhausted from the strain of repeated forced pregnancies and they are often slaughtered after just three years.

- It is well known that uncastrated males can't usually live bonded with any other rabbits safely and may be quite aggressive.
- Un-neutered males occasionally develop cancer in their testes and prostate gland.
- Young rabbits bred to be exploited for their meat are killed at a fraction of their natural lifespan, around 16 weeks, whereas domestic rabbits may live on average for 10 -12 years.

On account of the multitude of issues that we raise, I would urge you to refuse permission for this planning application.

Yours faithfully,

Tor Bailey
Campaign Manager
(on behalf of)
Animal Aid