



⋮ **Planning  
for the  
Future:**

Intensive animal agriculture,  
sustainable development and  
planning law.

 **A guide for local authorities**



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# Overview

As large-scale intensive farms are on the rise in the United Kingdom, planning authorities may be required to process more planning applications for these facilities. The purpose of this guide is to provide information to assist authorities when considering such applications. This guide is not intended to constitute legal advice, but rather a place from which decision makers can begin to conduct their enquiries and undertake further research and/or seek professional advice.

This guide has been prepared for Councils in England and Wales considering planning applications for facilities that will involve intensive animal agriculture. The purpose of this guide is to provide information about the impacts of intensive animal agriculture and detail how the impacts of intensive animal agriculture intersect with planning considerations.

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## Part 1

The first part of this guide considers the impact of intensive animal agriculture and the extent to which it aligns with the objectives of the National Planning Policy Framework (NPPF). This section:

1. Outlines the objectives of planning law and how sustainable development is integral to it.
2. Details what intensive animal agriculture is and how it intersects with the three core concepts of sustainable development: environment, economy and social factors.

## Part 2

The second part of this guide takes a deeper look at planning law and the aspects of it that are relevant when considering applications for intensive animal agricultural facilities. This section:

1. Details relevant planning documents.
2. Outlines material considerations alongside relevant case law.





# Part 1: Planning law

## 1.Planning Law: The Basics

### 1.1. Why do we have planning law?

The purpose of the planning system in England and Wales is to regulate the development and use of land. The broad objective of the planning system is to achieve sustainable development.

Planning in the UK is devolved, but there are significant similarities between the English and Welsh systems. The government policies that have been created to guide planning authorities are:

- The National Planning Policy Framework in England
- Planning Policy in Wales

The objective of sustainable development lies at the core of both of these documents.

### 1.2. What is sustainable development?

The widely accepted definition of *sustainable development* is that it is an approach to development (including land use) that ensures we are *meeting the needs of the present without compromising the ability of future generations to meet their own needs*. The adoption of the concept of



sustainable development arises in part from the UK's adoption of international law, and pre-Brexit, EU law.

There are three broad issues that are considered and balanced when determining the viability of a development from the perspective of sustainability:

ENVIRONMENTAL	ECONOMIC	SOCIAL
Environmental factors are those that can impact on the planet's ability to sustain life, such as pollution and climate change.	Economic factors are those that can impact on long-term economic wellbeing, such as the management of resources.	Social factors are those that impact on equality, wellbeing and social cohesion, such as access to health services.

Given the breadth of what sustainable development entails, there can be competing priorities. Decision makers therefore need to strike a balance between the environmental, economic and social objectives. Achieving the objectives of sustainable development requires an understanding of the economic, social and environmental specifics of the locality, alongside a very clear understanding of the impacts of the proposed development.

## **2. Sustainable development and intensive animal agriculture**

This section considers the objectives of sustainable development alongside the social, environmental and economic impacts of intensive animal agriculture. The purpose of this section is to provide decision makers with information about this industry to enable decisions that achieve the objectives of sustainable development.

### **2.1. A sustainable food system: not anti-meat - just pro-planet**

It is acknowledged that there will always be a demand for meat products. This guide does not propose that animal agriculture should be eliminated, but rather in determining applications for intensive agricultural facilities, decision makers should have regard to food systems that support the objective of sustainable development. This means considering food

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production methods that support sustainable diets. The United Nations Food and Agricultural Organisation defines sustainable diets as:

*'[t]hose diets with low environmental impacts which contribute to food and nutrition security and to healthy life for present and future generations. Sustainable diets are protective and respectful of biodiversity and ecosystems, culturally acceptable, accessible and economically fair and affordable, nutritionally adequate, safe and healthy; while optimising natural and human resources'* (UNFAO, 2010).

## **2.2. The focus on intensive animal agricultural systems**

The focus of this guide is on the impact that intensive animal agriculture poses, and whether it can align with the objectives of sustainable development. It is noted that there are many different ways to raise livestock that pose varying impacts on economic, social and environmental issues. The focus on intensive animal agriculture is because it is considered, on balance, to be the most problematic way in which to produce meat products from a social, environmental and economic perspective.

## **2.3. What is intensive animal agriculture?**

In this document, the term intensive animal agriculture refers to a method of large-scale farming where significant numbers of animals are kept and raised in confined living conditions (FAIRR, 2019). Instead of grazing or seeking feed in pastures or fields (otherwise known as extensive farming), concentrated feed is brought to the animals, who are largely confined indoors. The purpose of intensive agriculture is to maximise production and profits by using as few resources as possible (Anomaly, 2015).

Different terms are used for this type of farming, these include factory farming, concentrated animal feeding operations (CAFO) and confinement systems. There are also species-specific terms such as intensive poultry units (IPU).

## **3. The environmental, social and economic impacts of intensive animal agriculture**

The following section will provide summaries of research that deals with the sustainability of intensive animal agriculture. As the issues are wide ranging

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this guide is focussed on issues that are of particular relevance to planning and the environmental, social and economic priorities of sustainable development. There is a degree of overlap between the priorities and the factors that impact on them, and this is notable because sustainable development requires having regard to, and balancing environmental, social and economic objectives.

When considering food systems, there is a strong consensus within the scientific community that in order to achieve the objectives of sustainable development *“a radical transformation of the global food system is needed...”*, that necessitates a movement towards *“...a diet rich in plant-based foods and with fewer animal source foods”* (EAT-Lancet Commission, 2019).

### **3.1. The environmental impacts of intensive animal agriculture**

Sustainable development seeks to ensure that we live within our environmental limits. This means undertaking activities that do not cause or contribute to environmental destruction.

This report will not consider all the environmental impacts posed by animal agriculture but will focus on four key problems: land use, greenhouse gas emissions, water use and water pollution.

### **3.2. Land use**

Intensive agriculture involves keeping large numbers of animals in small spaces (sometimes referred to as high stocking density) of animals, so proportionately it uses less land than other farming systems. In intensive systems food is brought to the animals e.g. they do not graze on pastures. Consequently, in intensive systems, the land used for the actual rearing of animals is only one factor when considering land use, and consideration should also be given to land that is dedicated to the farming of crops to produce animal feed. This is less of an issue for animals in extensive systems (e.g. those that graze in pasture) because a large portion of their food is obtained through grazing, and these systems are less densely stocked (although it is however acknowledged that supplemental feeding in extensive systems is used). But the overarching issue is that the growing of animal feed is a factor

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that goes directly against the sustainability of the farming system and intensive agriculture relies on large quantities of food crops.

### **3.2.1. Land to produce animal feed**

Forty percent of arable land in the UK is used to grow crops to feed animals (WWF- UK, 2022). Feeding animals that in turn will be used to feed humans places a significant burden on food systems and the natural environment. The concern is that animal products require huge feed inputs to produce proportionately small protein outputs.

Feed conversion ratios measure the total amount of feed consumed per kg of milk or protein produced (Rouillé et al., 2023). It is a way to measure efficiency of production. The World Wildlife Fund found that dairy and meat products only provide 32% of calories consumed in the UK, but by contrast livestock and their feed make up 85% of all the land used in the UK for agriculture (WWF- UK, 2022).

The concern is that using land to produce animal feed is not an efficient and environmentally sustainable way to feed people (Ritchie, 2017). If land used to grow animal feed was instead dedicated to growing crops to feed humans, research suggests 70% more calories for human consumption could be produced - creating enough food to feed up to 4 billion more people (Rust et al., 2020). This is an issue that goes to food security and is discussed further in Section 3.6.1.

### **3.2.2. Land use and biodiversity<sup>1</sup> loss**

The United Nations has stated that preserving biodiversity is “our strongest natural defence against climate change” (United Nations, 2023). Agriculture is one of the key drivers of biodiversity loss (The Royal Society, 2023). Conversion of land to agriculture destroys, removes, or fragments the vital habitats that many species depend on for survival. Some examples of why biodiversity is important include:

- Ecosystems such as forests and peatlands are natural carbon sinks.

<sup>1</sup>Biodiversity relates to the multiplicity of species of animals, plants and microorganisms, as well as the genetic diversity within these species FUTHAZAR, G. 2020. Biodiversity, Species Protection, and Animal Welfare Under International Law. In: PETERS, A. (ed.) Studies in Global Animal Law. Berlin, Heidelberg: Springer Berlin Heidelberg.

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- Biodiversity loss contributes to disease risk. As wild animals are increasingly displaced and there is less land able to accommodate their habitats, these animals inevitably come into greater contact with communities and animals within them. This produces a risk of disease transmission. Disease is an environmental risk as it can pose threats to populations of wild animals (e.g., bird flu), but is also a social risk as such diseases may transfer to humans, and economic risk as these diseases can infect animals in these intensive facilities.

If less land is used for agriculture, and either left or returned to its natural state, this will begin to address biodiversity loss to a significant degree.

### **3.2.3. Land use for monocultures**

The industrial grain produced to feed to livestock in intensive farms is often grown on large stretches of intensive monocultured land. Monocultures require the heavy use of agricultural chemicals because the crops are more prone to pests and disease due to the fact that they are lacking in biodiversity. A more diverse system of plants and animals creates competition that tends to prevent one species from dominating (Balogh, 2021). Insect pollinators were found to be 70% less abundant in intensively farmed areas due to the reduction in biodiversity because of both the monocultures and the pesticide and herbicide use (Millard et al., 2021).

## **3.3. Greenhouse gas emissions**

Greenhouse gases (GHG) contribute to climate change by, in part, trapping heat in the atmosphere and increasing temperatures (British Geological Survey, 2023). Therefore, one of the objectives of the international community and the UK to address climate change is to reduce GHG emissions.

### **3.3.1. Animal agriculture is a significant contributor to GHG emissions**

The animal agriculture sector is a major contributor to the total GHG emissions of the UK. The Department of Environment, Food and Rural Affairs (DEFRA) states that agriculture accounts for 10% of the

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UK's GHG emissions, with 85% of these emissions made up from animal agriculture (Barthelmie, 2022). These statistics, however, do not include the GHG impact of imported animal feed used in the UK. Given that approximately half of UK animal feed is imported, the GHG impact of animal agriculture is higher than the statistic stated by DEFRA (Barthelmie, 2022).

Different animals emit different quantities of GHGs, and the emissions depend not only on species but also on feed. What is irrefutable is that plant-based foods emit fewer greenhouse gases than meat and dairy, regardless of how they are produced (Ritchie, 2020).

### **3.3.2. Warming potential of the gases emitted by animal agriculture is high**

It is relevant to consider the type of gas emitted through animal agriculture. Carbon dioxide is often referred to when considering GHG emissions, in part because it has a very long lifespan in the atmosphere - up to 1,000 years (Buis, 2019). However, carbon dioxide emissions are not the only cause for concern - other gases present significant short-term risk because of the warming effect they have.

Two greenhouse gases that animal agriculture produces are methane and nitrous oxide, and animal agriculture is one of the biggest human driven sources of emissions of these gases (Plewis, 2022, Grossi et al., 2018).

Both of these gases impact global temperatures because they can trap heat to a far greater degree than carbon dioxide - methane is 25 times more potent at trapping heat whereas nitrogen oxide is 300 times more potent (Tian et al., 2020, Plewis, 2022). Nitrogen oxide also has a lifespan of around 120 years.

Given that it is imperative that we seek to reduce emissions in the immediate term to avoid warming beyond 1.5 degrees Celsius (IPCC, 2019), it is clear that not only is the lifespan of a greenhouse gas a concern, so too is its capacity to trap heat.

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### **3.3.3. Mitigation strategies to reduce GHG emissions**

There are ways to mitigate, to some extent, the impacts of GHG emissions from the waste produced in animal agriculture. Strategies can include anaerobic digestion, water removal from manure, aeration of solid manure etc. (Rivera and Chará, 2021).

The difficulty with such approaches is that there are often trade-offs because the mitigation strategies can be heavily reliant on fossil fuels and water, increase the emissions of other gases or pose significant environmental threats, such that the overall environmental impact may not be significantly changed (Rivera and Chará, 2021).

### **3.4. Water use**

Animal agriculture has a huge water footprint. For example it takes 15,415 litres of water to produce 1kg of beef (Stoll-Kleeman, 2015). The water usage predominately arises from the water used to grow animal feed (Gerbens-Leenes et al., 2013).

Water shortages in the UK, particularly England, are of increasing concern, with the Environment Agency expecting summer rainfall to decrease across England (Environment Agency, 2021), whilst government figures detail that 28% of groundwater aquifers and 18% of rivers and reservoirs have more water taken out than is put back in (Smedley, 2023). If, due to reduced rainfall, the farming of crops to feed animals in the UK will require more water from aquifers, rivers and reservoirs, the situation will become even more perilous and unsustainable.

Presently, half of the animal feed used in the UK is imported (Barthelmie, 2022). Increasing and/or continuing the importation of animal feed will not resolve the issue as unsustainable water use, wherever it occurs, can result in ecological changes that can exacerbate climate change. Water use is inextricably linked with climate change, and it is a transnational concern (United Nations, 2022).

### **3.5. Water pollution**

England's rivers are in the worst health of all nations in the United Kingdom, with only 16% achieving a good ecological status. Agriculture is considered to be a significant cause of this statistic (Lawton, 2023). The reason for this is

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multifaceted.

### **3.5.1. Nutrient pollution**

Due to the high numbers of animals in intensive agricultural facilities a significant amount of waste is produced. Before the waste is disposed of, it is usually stored in tanks or slurry lagoons. This storage can pose an environmental risk as poorly constructed, badly maintained and overflowing tanks and lagoons can pollute water sources (Lawton, 2023). Further, slurry is often disposed of by land-spreading on agricultural land as a fertiliser - when this is not adequately controlled the waste can also runoff into waterways causing pollution (World Animal Protection, 2022). Runoff can also occur when slurry is spread and it rains shortly afterwards - these are not always events that can be avoided.

Animals produce waste that is high in phosphorous and nitrogen - although it is noted that different species excrete these nutrients in different proportions, so regard should be had to the species farmed. Excess nutrients from animal wastes in waterways causes eutrophication - which is essentially the excessive growth of algae that blocks out light, depletes water of oxygen, and increases carbon dioxide. This can lead to the death of aquatic organisms (Holden et al., 2017).

Algal blooms, caused by eutrophication, can also be toxic to humans. These toxins can accumulate in the fish and other aquatic life, making them unsuitable for consumption. About 80% of European fresh waters exceed a threshold for high risk to biodiversity (Sutton et al., 2011). Algal blooms also pose threats to peatlands, which, amongst the benefits they provide, are carbon sinks, as it affects the bog-building moss called Sphagnum (Sutton et al., 2011).

### **3.5.2. Medicines, chemicals and heavy metals**

Veterinary medicines can remain in animal waste and enter watercourses through runoff or by leaching into groundwater. Certain medicines, such as those used to kill parasites in farm animals, are designed to kill several species, rather than just targeting a specific one. Therefore, when they are released into aquatic water systems can have devastating consequences on the



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aquatic ecosystem (Holden et al., 2017). Additionally, livestock feed often contains chemicals and heavy metals, that are detrimental to human health and the environment, are excreted by livestock and enter soils and waterways through the land spreading of waste (Hejna et al., 2021).

### **Case Study: Intensive Animal Agriculture and Water pollution: The River Wye**

River Wye - One high profile case reported in the media over recent years is the pollution of the river Wye. The Wye is the fourth largest river in the UK. A number of planning permissions were granted for chicken farms next to the river catchment, with the consequence that permission was given for multiple farms together housing over 20 million chickens (25% of the entire UK poultry industry). As a result of the many industrial units situated along the river, the pollution created has resulted in algal blooms stretching for over 140 miles, destroying over 90% of the river's ranunculi, a family of aquatic plants (BBC, 2023).

Reports suggest that around 60% of the Wye is currently in ecological crisis and is in threat of suffering irreversible damage if this behaviour continues (River Action, 2023). Over the last 6 years the runoff from factory farmed chickens has increased the phosphates to a level that exceeds the permitted levels under the European Union (EU) Habitats Directive (River Action, 2023).

A variety of wildlife species have suffered because of the pollution on the Wye, including otters, kingfishers, fish, and swans (Wilson, 2022). Between 2016 and 2019 the number of salmon caught on the Wye fell from 1,665 to an estimated 350 (Tian et al., 2020). Planning authorities granted many of the applications based on the grounds that they would probably have no significant environmental impact - but each application was considered in isolation and at no point were the cumulative impacts of the high volume of chickens being reared in proximity considered (Monbiot, 2022).

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## 3.6 Social impacts of intensive animal agriculture

Sustainable development seeks to ensure that we live within our environmental limits. This means undertaking activities that do not cause or contribute to environmental destruction.

This guide will focus on the following social impacts caused by intensive animal agriculture:

- Food security
- Health impacts
- Impacts on communities near intensive farms

### 3.6.1. Food security and domestic meat production

Food producers often refer to the concept of food security within planning applications. Food security is the ability to access safe and nutritional food. The concern is that the UK imports a significant amount of food and in order to become less reliant on imports and more food secure, it is better to produce food domestically. Therefore, animal farming in the UK should be encouraged.

To an extent this is true, but as noted previously, the UK is still heavily reliant on imported animal feed (Barthelmie, 2022), so domestic meat production does not necessarily avoid importation of foodstuffs. Furthermore, the UK already has a significant number of intensive animal agriculture facilities - over 1,700 megafarms (those housing at least 2,000 meat pigs, 750 breeding sows, or 40,000 poultry) (Wasley, 2017). In addition, measuring food security is multifaceted and the location of production is one consideration - the type of food production being proposed is another. Where the food production method will exacerbate environmental degradation, this may lead to the UK becoming less food secure. In short: domestic food production does not necessarily equate to food security.

According to a study published in *The Lancet* in 2021 the consumption of meat products in the United Kingdom is at a level

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that is unsustainable (Stewart et al., 2021). In 2021 the government-commissioned national food strategy for England recommended that people should cut their meat consumption by 30% (National Food Strategy, 2021). The finding that meat consumption must be reduced in order to mitigate the effects of climate change is also echoed in reports by the Intergovernmental Panel on Climate Change (IPCC, 2019). Domestic intensive animal agriculture does not appear to be the answer to food security concerns.

### **3.6.2. Health impacts of intensive animal agriculture**

#### **3.6.2.1. Disease risk and antibiotic use**

Animals kept in intensive agriculture are susceptible to disease because of the conditions in which they are kept (Kessler et al., 2021). Huge numbers of animals are kept in unnatural conditions in very close proximity to one another. This creates stress which in turn weakens animals' immune systems (Anomaly, 2015). This exacerbates the disease risk and, where disease occurs, makes it more likely to spread. To understand the conditions that intensively reared animals are kept in it is helpful to consider some of the space requirements:

- The maximum stocking density for chickens is 39kg per square metre - that's around 17 chickens per sqm (DEFRA, 2018).
- A fully grown pig over 110kg is only required to have 1 square metre of floor area allotted to it in herd housing (DEFRA, 2023).

Alongside bacterial infections, the conditions in intensive facilities also pose a viral disease risk. As has been recently experienced influenza viruses pose a significant threat to people (COVID) and animals (bird flu, swine flu etc) (Hayek, 2022).

To attempt to address the risk of some diseases, the UK allows farmers to use antibiotics prophylactically (before disease occurs) as a way of preventing disease outbreaks.

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Seventy three percent of antibiotics used globally are used on farmed animals – and this is projected to increase by 2030 (Mulchandani et al., 2023). Antibiotics are used most frequently in intensive pig and chicken farms, but can also be used for cattle (Alliance to Save Our Antibiotics, 2022). Resistance to antibiotics is considered to be a side effect of widespread, indiscriminate use of the drugs – as occurs in agriculture (Manyi-Loh et al., 2018).

Antibiotic resistant bacteria can be easily transmitted to humans via food chains and through the environment via animal waste (Manyi-Loh et al., 2018). Antibiotic resistant bacteria can lead to serious illness in people creating both emotional trauma and incurring significant cost to the healthcare system.

### **3.6.2.2. Air pollution**

Livestock houses are a source of air pollution both inside and outside of the housing (Cambra-López et al., 2010). Intensive agriculture produces particulate matter that can penetrate deeper respiratory airways and compromise both the health of animals and people in the vicinity (Cambra-López et al., 2010). The health concerns detailed above are most acute for those living in the vicinity of a farm. In particular air pollution from intensive farming poses a threat to the respiratory health of those nearby (Smit and Heederik, 2017).

### **3.6.2.3. Overconsumption of meat**

Intensive animal agriculture produces meat that is, relative to other forms of farming, cheaper. It enables more people to eat meat more frequently. Whilst meat does contain essential nutrients, excessive consumption of processed meat and red meat has been linked to adverse health outcomes, such as coronary heart disease, type 2 diabetes, obesity and various cancers (Rust et al., 2020). These risks are in part why the national food strategy in England makes a recommendation to reduce meat consumption.

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### 3.7. The economic impacts of intensive animal agriculture

Sustainable development is concerned with ensuring sustainable economic growth – this means ensuring that industries do not deplete the resources of future generations or negatively impact on the social structures of communities. It also means ensuring access to decent work which is work that is productive and delivers a fair income.

Intensive animal agricultural facilities can have benefits for the local economy by providing, for example, employment. The benefits however need to be carefully assessed and weighed against the risks. This section will focus on the companies involved in intensive animal agriculture and the employment and economic impacts they can have on the local area.

### 3.8. Companies/ Employment

The benefit to the local economy is often provided as a factor in favour of a development. There is a growing shift from small family run farms dominating the farming scene to fewer, much larger industrial farming systems run by big corporations (Lobley, 2016). It has been argued that these large farming businesses should bring along with them a boost to the local economy, creating more income and employment for local people. Yet, it seems that the concentration of these factory farms removes a higher percentage of money from rural communities when compared with smaller farming systems. Small farms tend to spend more money within the community, create more jobs for local people and reinvest more money back into the area (Donham et al., 2007). Local economies no longer have as much control over their own markets, farmers can feel disempowered or disenfranchised, and there appears to be less transparency on how decisions are being made.

Whilst there will undoubtedly always be some benefit to local businesses from these farms, intensive agriculture is dominated by large companies that are privately owned and often have very little connection to the area in which the farm is based. Some are held by overseas companies (Davies, 2017). This means that profit may flow out of the local area and back to the holding corporations to be distributed to members. There runs a risk that a local community suffers the burden of these industries without commensurate

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economic benefits.

Employment is also often cited as a reason in favour of allowing an intensive agricultural facility. It must be noted however that intensive farms seek out efficiency and this partly involves increased mechanisation to reduce employee numbers. Reports have shown that per hectare of land, small farms tend to have more employees (Lobley, 2016).

Furthermore, the shortage of agricultural workers in the UK appears to suggest that these may not be jobs people wish to undertake. An independent report suggests reluctance to work in the sector is because of concerns around the physicality of the work and the low pay (Shropshire, 2023).

### **3.8.1. Impact on local community**

#### **3.8.1.1. Amenity**

The presence of factory farms in an area can be unappealing for local people or potential new residents. Aside from the environmental and potential health risks associated with living nearby (as detailed earlier in this guide), they are visually unattractive and often produce offensive odours that impact on residents enjoyment and use of the land (Hooiveld et al., 2015).

#### **3.8.1.2. Tourism**

The presence of factory farms in an area may also have negative impacts on local industries e.g., tourism related businesses such as holiday rentals, canoeing, fishing, scenic tours etc. that occur close to rivers and other natural wildlife hotspots. If pollution levels are high, these businesses will be negatively affected. For example pollution in the River Wye has significantly impacted salmon populations, which will have impacts on businesses that are centred around fishing and angling (Wilson, 2022).





# Part 2: Planning Applications

## **Dealing with planning applications for intensive animal agriculture facilities**

Part 1 is designed to complement Part 2 by providing an overview of the extent to which intensive animal agriculture aligns with the objectives of sustainable development. Part 2 sets out ways in which planning law can assist decision makers who are considering the potential impacts of an intensive animal agricultural facility.

This is not a comprehensive coverage of all relevant law, it is not intended to be legal advice and decision makers should always seek expert advice if in doubt. This guide is provided to help guide decision makers in their enquiries. When considering a planning application there are a number of factors decision makers must have regard to. This guide does not list or consider all the factors but focuses on those most relevant to developments for intensive animal agriculture.



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## **4. Planning documents**

### **4.1. Development Plans**

Development plans establish the vision and framework for the development of a locality. Simply put, development plans set out the parameters for how an area can be developed and will give an indication of the kinds of agricultural development the community will support and where they may be located. Planning law requires that applications for planning permission must have regard to the development plan, unless material considerations indicate otherwise.

Development plans may comprise several, separate development plan documents (DPDs), or one comprehensive local plan document. Local plans, neighbourhood plans, and supplementary development plans are all types of DPDs.

All plans must demonstrate how the NPPF's three objectives - economic, social, and environmental - have been addressed.

#### **Other documents that may be relevant: The Local Development Framework**

All of these may provide information about issues that relate to the extent to which intensive animal agriculture can be accommodated in a locality:

- Local development schemes.
- Annual monitoring reports.
- Local development orders.
- Simplified planning zones.
- Supplementary planning documents.

#### **4.1.1. Priority given to the development plan**

The provisions of the development plan must be followed unless there are material considerations that demonstrate why a development plan should be departed from. The leading case that confirms this position is *Tesco Stores Limited v Dundee City Council (Scotland)* [2012] UKSC 13 (Tesco Stores).

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Decisions about the application of a development plan are made on a case-by-case basis. Where there is a departure from the development plan due to other material considerations, it must be made clear why the provisions of the development plan are not being followed.

#### **4.1.2. Development plans are often worded in broad terms - what happens if it seems there are a range of options open to a decision maker?**

The general rule set out in the Tesco Stores case is that Local Planning Authorities have particular expertise in planning matters and can exercise discretion when making decisions. However, this is subject to the following:

- Decision makers must have regard to the development plan.
- There is a presumption in favour of approving plans that are compatible with the development plan, unless there are material considerations that come into conflict with it, or on which the development plan is silent.
- If a local authority chooses to give more weight to other material considerations, that is a matter for that Local Authority. But, if appealed or reviewed, a court will look to make sure that Local Authority has had regard to the presumption in favour of the development plan and whether the proposal accords with the development plan as a whole.
- The court will not consider the weight which should be given to the development plan in light of other material considerations. This is a balancing act for the local authority who are the experts in their field and their locality and highlights the significant discretion that planning decision makers exercise.

Alongside material considerations, the following reasons for departure from the development plan will also be relevant:

- Where the development plan is out of date or contains no policies that relate to the proposed development.
- Where policies have been superseded by more up to date planning guidance.
- Where objectives or positions have changed, and policies are no longer relevant.

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- Where there are emerging plans.
  - Whether older policies are consistent with the NPPF.

#### **4.1.3. Interpretation: What to do when the meaning of certain words in a development plan is not clear?**

If the decision maker feels that there is a part of planning policy that needs to be interpreted in relation to the particular planning application, then this is a matter for the courts. This was confirmed in Tesco Stores.

For example: A development plan sets out that developments to create factory farms should be supported.

**Decision for a local authority:** If a local authority considers the requirement of the development plan to be clear and it understands what factory farms are, but considers that there are material considerations, such as health and safety, that outweigh the requirements of the development plan, then it can refuse the application. The decision maker must show that regard was had to the provision of the development plan supporting factory farms and explain why there was a departure from it.

**Decision for the Courts:** If a local authority is unclear what is meant by “factory farm” such as the nature and size of developments that would meet the definition, a local authority cannot define the term itself. The authority should seek the guidance of the Court.

#### **4.1.4. What to do if a development plan is silent on issues relating to intensive animal agriculture/ is your development plan out of date?**

If your council is concerned about the impacts of factory farming, you may wish to consider addressing this issue as part of your Development Plan or in the short term through the creation of a supplementary development document.

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## **5. Material considerations**

Material considerations are matters that a planning authority can have regard to when considering whether to approve a planning application. For the purposes of intensive agricultural developments, there are three areas that need to be considered when discussing material considerations. These are:

1. National Planning Policy Framework (NPPF)
2. Environmental Impact Assessments (EIA)
3. Other material considerations

### **5.1. The National Planning Policy Framework**

This guide has already mentioned the NPPF in Part 1. The NPPF should to some extent already inform the decision process because development plans are required to be prepared in accordance with the objectives of the NPPF. But the NPPF is also considered a material consideration, and this affects decision makers particularly where the development plan is absent, silent, or out of date. In these situations, decision makers should:

- Consider whether the adverse impacts of granting permission would significantly outweigh the benefits when assessed against the policies in the NPPF. The aim is to essentially minimise any negative impacts on sustainable development goals.

The NPPF states that the planning system should support the transition to a low carbon future in a changing climate with a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures (section 14). It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

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- Whether there are any policies in the NPPF that would suggest the development should be restricted. So, if possible, alternative options that reduce or eliminate negative impacts on sustainable development goals should be considered. If significant negative impacts cannot be avoided, appropriate measures should be carefully proposed to lessen their effects.

Decision makers must provide clear and convincing reasons in the event they choose to diverge from the National Planning Policy Framework, for any reason, since it is a material consideration.

Core to the NPPF is the concept of sustainable development. Sections 2-3 consider the impacts of intensive animal agriculture within the context of sustainable development objectives.

## **5.2. Environmental matters: Environmental Impact Assessments (EIA)**

The Environmental Impact Assessment Directive concerns the effects of certain public and private projects on the environment. The purpose of the Environmental Impact Assessment Directive is to safeguard the environment by ensuring that local planning authorities have complete knowledge about the potential significant effects of a project before granting planning permission, and that the authority takes this knowledge into account in the decision-making process.

The goal of the Environmental Impact Assessment is to ensure that planning decisions are made with full knowledge of a project's likely significant environmental effects, and that any negative effects are prevented, reduced or offset, while positive effects are enhanced.

The directive outlines a process to determine which projects require an Environmental Impact Assessment, and establishes guidelines for evaluating, consulting, and deciding on projects that are likely to have notable environmental impacts. The EIA also ensures that the public has the opportunity to participate effectively and at an early stage in the decision-making process.

One of the principles that underlies the EIA process, and indeed is a core

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principle of environmental law, is the precautionary principle. The precautionary principle implies that in cases where it is unclear whether an EIA should be conducted, then a decision maker should err on the side of caution and resolve in favour of conducting an EIA. It is not enough for a decision maker to waive the requirement for an EIA because they consider the information will be provided with the application in any event.

### **5.2.1. Difference between Environmental Statements (ES) and Environmental Impact Assessments (EIA)**

Case law often refers to both EIA and ES, or switches between the two. To clarify: an Environmental Impact Assessment (EIA) is the process of identifying the environmental impacts and effects of a proposed development. The Environmental Statement (ES) is the actual document produced at the end of an EIA. An ES is part of the EIA process, summarising the findings of the EIA, informing decision makers of the environmental implications of a proposal.

The local planning authority has the power to decide whether an ES has sufficient information in it to make a decision. The question comes down to the adequacy of the information, and whether the ES contains the material it is required to contain. Courts will interfere in these decisions only on *Wednesbury* grounds (see Section 6.3).

### **5.2.2. Intensive animal agriculture and EIA - when is an EIA required?**

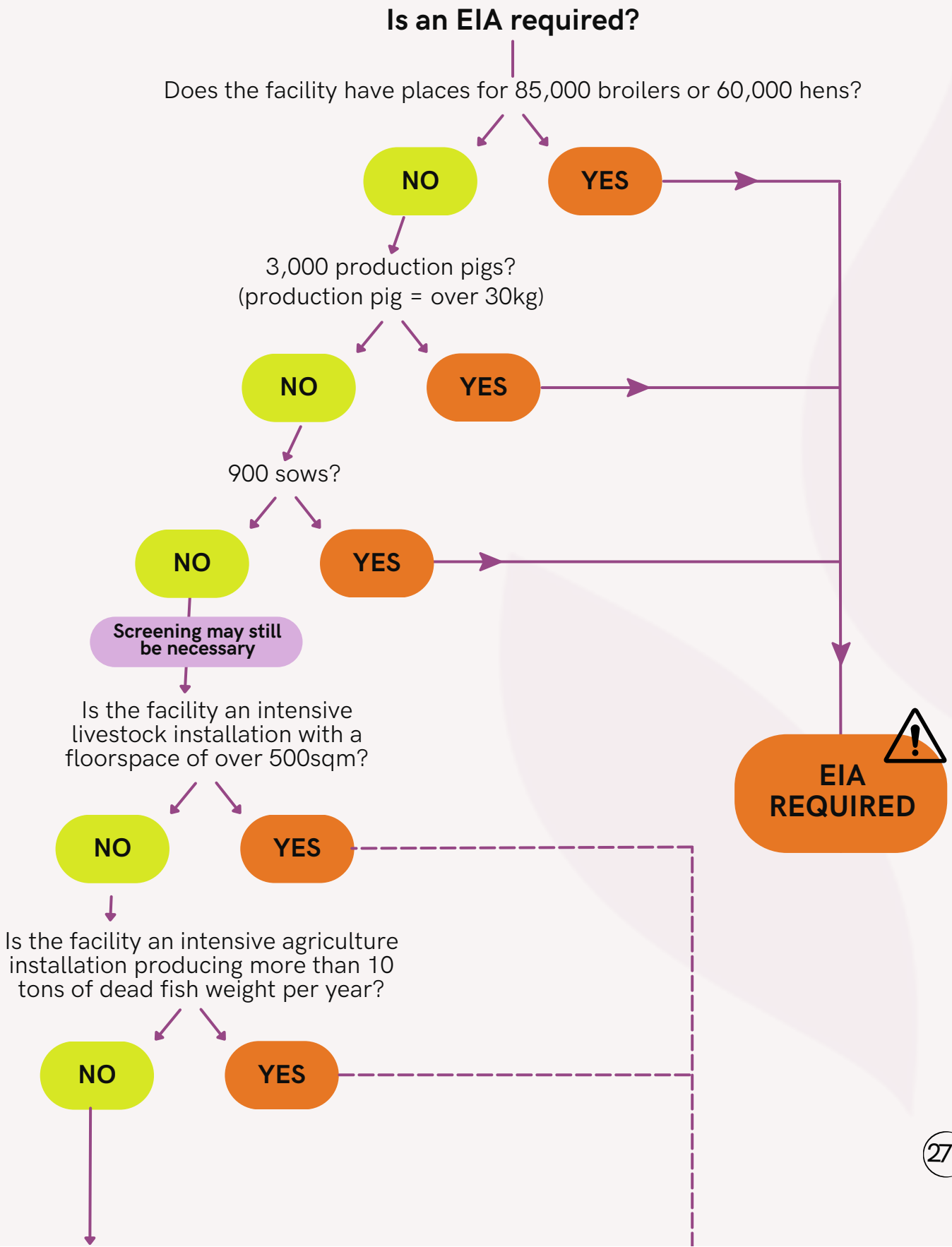
Applications for intensive animal agricultural facilities will invariably require an EIA because of the environmental impacts.

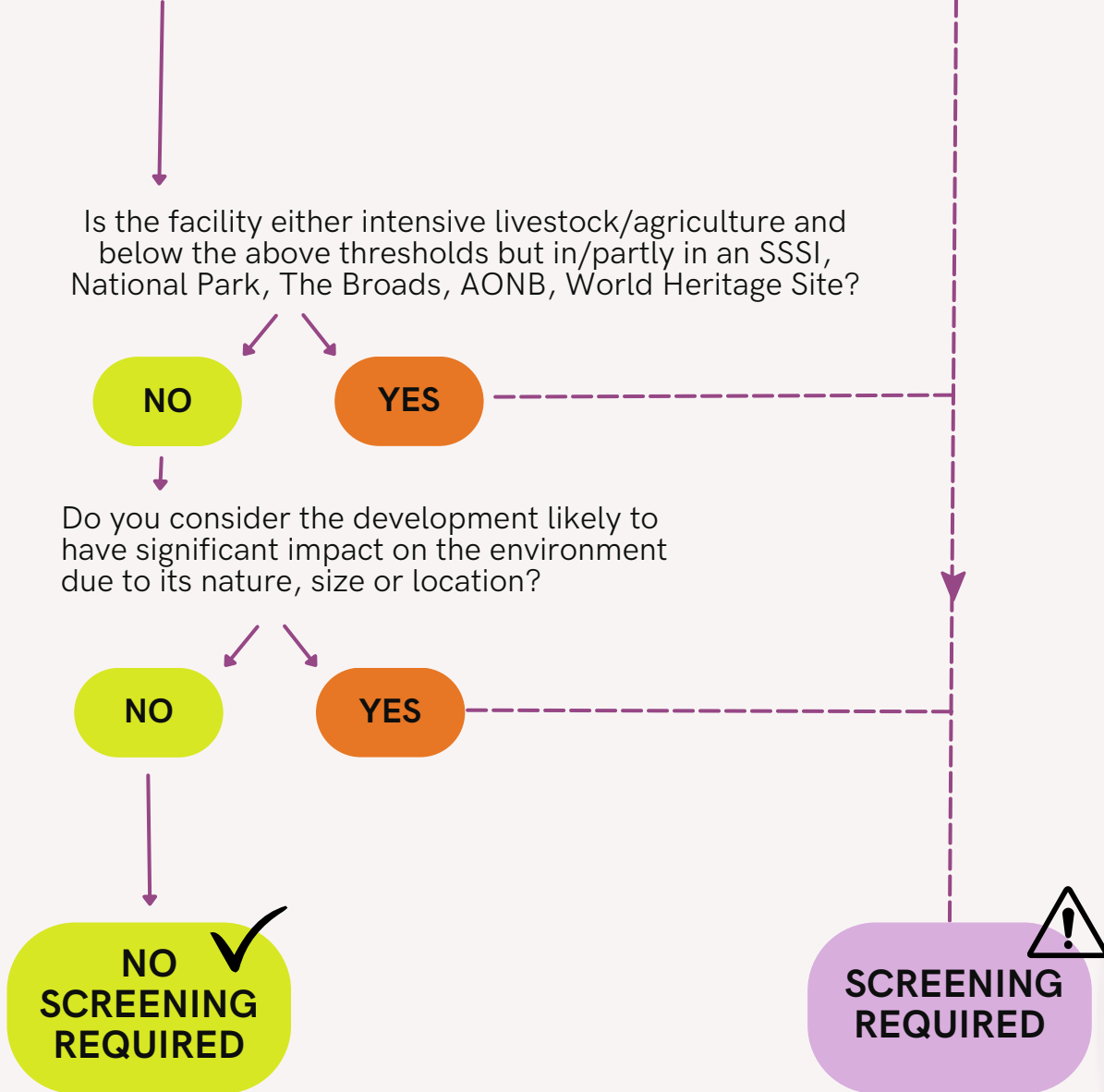
Note there are different statuses in England and Wales as regard EIAs.

The relevant statute in England is: *The Town and Country Planning (Environmental Impact Assessment) Regulations 2017*

The relevant statute in Wales is: *The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2017*. There is another piece of legislation in Wales relating to EIAs for semi-natural and/or uncultivated land - *The Environmental Impact Assessment (Agriculture) (Wales) Regulation 2017* - these regulations are not considered in this guide.

The legislation provides guidelines as to when an EIA is required. This section will outline factors that are relevant for intensive animal agriculture facilities. It will canvas developments where there is a statutory obligation to obtain an EIA and also developments where it is at the discretion of the local authority.





### 5.2.2.3. Factors that impact whether or not an EIA is required and the scope of it

#### Screening where a development is considered to have a significant impact - how to determine what a significant impact is

Guidance can be found in case law and some factors relevant to intensive animal agriculture are listed below. But it is not possible to provide a definitive list. Whether a development is considered likely to have a significant impact is for the decision-maker as they are considered experts in such matters. Courts will only interfere if the decision is affected by Wednesbury unreasonableness (see Section 6.3 for an explanation).

#### Is it a project that falls within the scope of EIA regulations?

The definition of development under *s55* of the *Town and*



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*Country Planning Act 1990* does not determine whether a project falls within the EIA regulations. For example, demolition work, which is not a development under the *Town and Country Planning Act*, could fall within the EIA regulations. This was an issue in a case involving planning permission for poultry units in R. (on the application of *Save Woolley Valley Action Group Ltd*) v *Bath and North East Somerset Council* [2012] EWHC (Admin) 2161.

Here, the local authority decided that poultry units did not constitute 'development' under the *Town and Country Planning Act 1990* and so decided that the proposal did not require an EIA. However, on review the Court found poultry units constituted "intensive livestock installations" and so found that the local authority erred in granting planning permission without completing an EIA.

The difference is explained by the intensive farming aspect of the development. When farming is involved, especially intensive developments, case law shows that the safer decision is to complete an EIA to determine the environmental effects.

### **Significant impacts vs significant adverse impacts**

The issue is whether a development will have significant environmental effects, not whether it will have significant adverse environmental effects. An EIA should be carried out if the development will have significant effects, beneficial or adverse per *British Telecommunications Plc v Gloucester City Council* [2001] EWHC (Admin) 1001.

### **Anticipated good does not outweigh the bad at the screening stage**

Any significant adverse effects cannot be considered to be outweighed by beneficial effects at the screening stage. In other words, an EIA cannot be waived because it is considered overall the development will have a beneficial/ no impact on the environment - *British Telecommunications Plc v Gloucester City Council* [2001] EWHC (Admin) 1001

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## **Decision-maker should point to some evidence when requiring an EIA – but this does not need to be extensive**

It is accepted that a decision-maker will have to determine whether an EIA is required on the basis of limited information. A wide discretion is afforded - but a court will be concerned to look for some objective evidence to substantiate the decision. Decision-makers aren't expected to provide lengthy written reasons.

## **Impacts beyond the development in issue should be considered**

In *Squire, R (On the Application of) v Shropshire Council* [2019] EWCA Civ 888, the planning application stated that manure from the development would be spread on the development land and also on third party land. The environmental assessment focused on the regulation of the development only. It failed to properly assess the impact on the environment and impact on residential amenity caused by odour and dust from the storage and spreading of manure on third party land.

On appeal the court found that the planning officer failed to consider that the plan did not account for the environmental effects likely to occur off of the operator's own land, and it did not control for odour and dust pollution. The Court found the EIA was deficient. Further, the manure management plan was not a substitute for the needed assessment of an EIA.

## **Parallel consent regimes do not detract from requirement to consider whether an EIA is required**

In the decision of *Atkinson*, the Court notes that a decision maker must decide whether an EIA is required on the basis of the information provided to them. The decision maker cannot avoid this requirement simply because the applicant will require consent from some other responsible body.

Irrespective of whether consent is required from another body (such as a body that regulates pollution), a decision

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maker must have regard to whether there are likely to be significant effects in that area, or what they will be or what mitigation measures are needed.

### **Mitigation measures at the screening stage**

Mitigation measures are actions that a developer will take to limit or counter the adverse impacts of a development. Mitigation measures can be taken into consideration at the screening stage. However, these measures must be considered in relation to the impact of the entire development and having regard to the precautionary principle - so where there is doubt, an EIA should be sought.

### **Court cannot retrospectively dispense with an EIA**

In *Berkeley v Secretary of State for the Environment & Ors* [2000] 3 WLR 420, the appellant argued that planning permission had been granted (for development of a football stadium) without consideration of the need for an EIA. It was held that the court was not empowered to retrospectively dispense with the requirement to carry out an EIA on the ground that the outcome would have been the same, or the local planning authority had all the information required to reach a decision on environmental issues.

### **What principles can be taken from these cases?**

The takeaway from these cases is that environmental statements and assessments properly assess all direct and indirect environmental effects likely to arise from a development. These assessments should not make any unfounded assumptions regarding limitations or mitigation of any potential effects. Reliance on other systems or regulations to address any issues down the line is no excuse for failing to gather all relevant information in the planning stages.

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Case law supports the precautionary principle - if a decision-maker is in doubt, seek an EIA. A decision-maker cannot say an EIA is not required because the information will be provided with the application anyway. If an EIA is required, an LPA must state this explicitly and ensure one is provided. It is also important to ensure that where an EIA is obtained, it has adequate scope.

#### **5.2.2.4. What an EIA must contain**

The environmental impact assessment shall identify, describe and assess the direct and indirect effects of a project on the following factors:

- (a) human beings, fauna and flora.
- (b) soil, water, air, climate and the landscape.
- (c) material assets and the cultural heritage.
- (d) the interaction between the factors referred to in points (a),(b) and (c).

#### **5.2.3. Decision makers must have regard to an EIA**

EIA regulations state the requirement to say in the decision notice that the environmental information was taken into account.

### **5.3. Other material considerations**

This section considers other material considerations that may relate to applications for intensive animal agriculture facilities.

The general rule is that decisions must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. When thinking about material considerations, two questions must be asked:

1. Is something a material consideration?
2. How much weight should the material consideration be given?

The first is a question of law, and the second is a question of planning judgement.

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### 5.3.1. What is a material consideration?

There is no definitive list as to what is a material planning consideration. Broadly, it is a consideration which is relevant to the decision being made - a fact that would tip the scales one way or another. The key issue in determining whether a consideration is material or not will to a large degree depend on the facts and circumstances of each application.

This guide considers below matters that have previously constituted material planning considerations- but with the caveat that each case is assessed on its own facts.

- **Must relate to the development**

Material planning considerations must relate to the development and/or the use of the land. So, in relation to intensive animal agriculture, this will include factors such as the number of animals kept, the size of the facility, the layout of the facility, the siting, design and appearance and waste generation and disposal.

- **Waste**

The waste generated by a proposed development and how it will be disposed of may be considered a material planning consideration. Waste will be an issue that all intensive agricultural facilities will have to consider. Although it is noted that waste disposal may be covered by separate pieces of legislation.

Resources on this issue can be found above at Section 3.3 and Section 3.5.

- **Air quality**

Air quality is mentioned in the National Planning Policy Framework. In relation to intensive animal agriculture, the following air quality issues may be relevant:

- Whether the development would significantly affect traffic in the area - this could be through transport trucks carrying animals and feed, staff movements, waste disposal vehicles etc.
- A new source of air pollution will be introduced - unless the site housed an existing intensive facility already this would be a likely consideration.

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- Impacts on biodiversity, particularly if it results in the deposition or concentration of pollutants.

Resources on this issue can be found above at Section 3.6.2.2.

- **Amenity and pollution**

The law affirms the importance of providing safeguards against loss of amenity, particularly loss of amenity which may be caused by pollution. *Gateshead MBC v Secretary of State for the Environment* [1994] Env LR 37 affirms that the extent to which discharges from a proposed plan will necessarily or probably pollute the atmosphere and/or create an unacceptable risk of harm to human beings, animals, or other organisms is a material consideration to be taken into account when deciding whether to grant planning permission.

So, in relation to intensive animal agriculture, factors that may affect amenity include:

- Land-spreading of waste and the attendant smell.
- Smells associated with the keeping of high numbers of animals.
- Noise pollution - the sounds from the operation of the facility/animals and the hours of the day these are likely to be heard.
- Volume and hours of transport to and from the development.

Resources on this issue can be found above at Sections 3.3, 3.4, 3.5, 3.6.2.2 and 3.7.2.1.

- **Mitigation of climate change/ GHG emissions**

The decision of *R (on the application of McLennan) v Medway Council* [2019] EWHC 1738 (Admin) related to renewable energy. However, it is helpful in so far as it affirmed that mitigation of climate change could be a material planning consideration. This may be relevant where an applicant outlines the benefits a facility may to the climate e.g., that it is local and so reduces carbon emissions from travel, but these would need to be considered in the round and weighed against the impact such a development may have on the climate.

In *R (on the application of Frack Free Balcombe) v West Sussex County Council* [2014] EWHC 4108 (Admin), the court affirmed that

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the effects of emissions generated by a development are a material planning consideration.

However, difficulties arise around the criteria/thresholds of emissions that are acceptable. A decision maker has discretion to rely on benchmarks it considers appropriate - per *Goesa Ltd, R(On the Application Of) v Eastleigh Borough Council* [2022] EWHC 1221 (Admin).

The court also noted in *Frack Free Balcombe* that emissions are likely to be subject to statutory controls by other bodies.

Resources on this issue can be found above at Section 3.3.

- **Economic benefits**

Whether the development will be good for the economic vitality of the area can be a material consideration.

Resources on this issue can be found above at Section 3.7.

- **Public opposition/ public concern about safety and health risks**

Public opposition is a factor to be considered provided there is evidence to justify the public's concern. In relation to intensive animal agricultural developments the public opposition may be based on concerns about health.

Many health and safety concerns will be the subject of regulation under other legislation such as pollution control. However, in *Harrison v Secretary of State for Communities and Local Government*, that related to an application for a change of use from agriculture to the processing of animal by-products, it was held that even where the development had been granted permits to operate, the planning inspector still was entitled to consider and reach their own conclusions about the impact of the development. Particularly where such a development may have an impact on amenity.

Resources on this issue can be found above at Section 3.6.2.

- **Whether the development is needed**

This is an issue that has arisen in relation to developments such as farm buildings and has not been tested in respect of an intensive

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animal agriculture facility. It is however noted as a factor that may be considered, particularly having regard to the discussion at Section 3.6.1 on food security.

## **6. Avoiding Appeals**

This is not intended to be a definitive guide, nor is it intended to constitute legal advice. This section sets out some factors to consider when making decisions about planning applications:

### **6.1. Interpretation of planning policy**

This is a question of law for the court; the judge has the last word regarding how a policy is to be interpreted. But the application of said policy to the facts of a specific development proposal is a determination for the decision-maker. The decision-maker in the planning process is given a wide remit.

### **6.2. Mistakes**

This covers the question of whether a planning committee was “materially misled”. Planning officers are allowed a great deal of discretion in their decision making. When a planning officer’s decision is under review, the question for the Court is whether parties were “materially misled” on a fair reading of the report.

Did the planning officer materially mislead members of the committee on a matter bearing upon the decision, which error has gone uncorrected before the decision was made? The error must be “significantly or seriously misleading”, viewed in the context and circumstances in which the advice was given, and its possible consequences.

### **6.3. Being unreasonable**

Reference is made through this guide to Wednesbury unreasonableness. This is a particular standard that is applied when assessing a public authority’s decisions. It is a stricter test than simply determining whether a decision is unreasonable – the threshold is very high. Wednesbury unreasonableness (or sometimes called irrationality) is where a decision maker has reached a conclusion that is so unreasonable that no reasonable person acting reasonably could have made it.



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## 6.4. Being biased

Bias is a legal issue, with a lot of litigation in recent years regarding local government decisions. There are a few types:

- Actual bias – a decision-maker acted on for/against a person because of personal favouritism/animosity, private interest, public or political reasons irrelevant to the purpose of the particular process.
- Predetermination or having a closed mind - when the decision maker decides how to act before being fully aware of all circumstances and arguments.
- An appearance of bias because of the real possibility that the decision was influenced by private or irrelevant interests. Note the appearance rather than the fact of bias suffices.
- An appearance of bias because of the real possibility that the decision was predetermined.

The reality is that planning is *inherently political*. But decisions must be reached lawfully, rationally and fairly. Committee members must have an open mind, but they cannot be required to have an empty mind.

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**This report has been prepared by *The Animal Advocacy Project* with funding.**

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