



Matthew Shepherd  
Head of Development & Planning  
West Berkshire Council  
Market Street  
Newbury  
RG14 5LD

*31st March 2025*

Dear Mr Shepherd,

**Re- 24/02641/FULMAJ – erection of an agricultural building for free range egg production and removal of existing free range egg units. Bradford’s Farm Borehole Halfway Newbury.**

The Angling Trust is the recognised national governing body for all forms of recreational fishing. We are a membership organisation united in a collaboration with Fish Legal, who take action on behalf the angling community in defence of fishing, fishing and the environment.

I’m writing on behalf of our member clubs, fisheries, and individual anglers who have contacted us with their concerns regarding the above-mentioned application which is seeking permission to create an egg production unit housing some 32,000 chickens – nearly three times the number currently housed in the existing mobile units – in the Kennet floodplain. These concerns primarily relate to the potential to cause harm to the SSSI chalk stream which is popular with anglers, bird watchers and wildlife enthusiasts.

We share the concerns of catchment hosts, [Action for the River Kennet](#) (ARK) and others, that the proposal creates a real and present risk of damaging nutrients, including nitrates, phosphate, and ammonia leaching into the River Kennet and underlying groundwater. Despite being a highly protected SSSI river the ecological status of the Middle Kennet was downgraded to ‘Poor’ in 2022, with “Diffuse pollution from agriculture and land management” listed as one of the reasons for not achieving “Good” Ecological Status (GES) under the Water Framework Directive.

### **Location**

There is little doubt that an increase in chicken farming on land situated in the floodplain, just 900 metres from the river, will increase the risk of highly damaging diffuse pollution. Attached is an arial photograph of the proposed site showing its proximity to the floodplain.

The area also falls within a Nitrate Vulnerable Zone, reflecting the high nitrate levels in groundwater. The intensification of poultry farming in this area only risks increasing this problem.

The Flood and Drainage Assessment prepared for the applicant by Alan Wood and Partners refers to the Environment Agency's Surface Water Map which "shows areas of land within the perimeter of the application that are at risk from surface water flooding varying from low to high risk." Surface water shown in Figure 7 of the Drainage Report submitted with the planning application shows how well connected the hydrology is to the river during wet periods. The location of this proposed unit poses a risk of nutrient runoff directly to the river, particularly in times of high rainfall.

### **Pollution in SSSIs**

We understand that the applicants intend to collect the chicken waste and spread it on the land as fertiliser rather than remove it from the site. We note that the application is for 32,000 birds which is below the threshold requiring an Environmental Permit. This places an increased onus on the local authority to ensure that all environmental considerations are taken on board and that appropriate guidance is followed.

Natural England, the Environment Agency and West Berkshire Council all have a statutory duty to "conserve and enhance the river Kennet and Lambourn SSSI."

Natural England has also advised planning authorities in 2020 that the unfavourable water condition of protected sites should be given 'due consideration before determining a planning application that may give rise to additional phosphates within the catchment.' This advice reflected existing legislation and recent caselaw, including the judgement known as 'Dutch Nitrogen'.

The recent High Court ruling by Justice Lieven that chicken manure is so toxic that henceforth it should be defined and treated as 'industrial waste' suggests that particular attention should be given to the proposed intensification on this site.

Phosphate pollution from agriculture in general, and chicken production specifically, is now a major cause of pollution in many of our rivers with now only 14% of them meeting good ecological status under WFD. There has been a massive nationwide increase in chicken production rising to an estimated 1 billion birds per annum with a 166 million increase in the last ten years. Set against this, the Environment Act has set targets for a 40% reduction in both nitrate and phosphates in water courses which is unlikely to be met should applications such as this are permitted in these vulnerable locations.

### **Phosphate Levels**

Phosphate pollution is a major contributory factor in the declining health of rivers leading to excessive eutrophication causing algae blooms and killing much of the life beneath the surface. The River Wye in Herefordshire is a prime example of the damage done by allowing the intensification of chicken rearing units to occur in sensitive river catchments. The Wye, once one of the nation's finest rivers, has now been downgraded because of phosphate pollution from intensive chicken farming.

Angling Trust water quality volunteers regularly monitor both phosphate and nitrate levels in the middle and lower Kennet. The recommended GES level for phosphates is 0.077 to 0.306 parts per million(ppm). The readings taken over the past year show that this range is exceeded on multiple occasions.

The Kennet has, in recent years, suffered from a loss of ranunculus (water crowfoot) – a plant synonymous with healthy chalk streams and particularly vulnerable to eutrophication.

The main impacts of phosphate pollution can be summarised as follows:

- **Eutrophication:** Excessive phosphate in water can lead to algal blooms, which deplete oxygen levels, harming aquatic life.
- **Water Quality Degradation:** Phosphate runoff can contaminate water sources, making them unsuitable for drinking or recreation.
- **Habitat Loss:** Algal blooms and reduced oxygen levels can disrupt aquatic ecosystems, leading to habitat loss and biodiversity decline.

In summary, the Angling Trust does not believe the applicants have demonstrated how the potential for pollution from this proposed intensification of chicken production can be avoided nor why this particular location is appropriate for this use. In fact, we believe that the evidence suggests that such activity has no place anyway near the floodplain of any river system much less a SSSI river like the Kennet. By agreeing to these plans a dangerous precedent would be established paving the way for other sites housing mobile chicken pens further up the Kennet Valley to become locations for more intensive poultry units.

We therefore call upon West Berkshire Council to reject this application.

Yours faithfully

Martin Salter

cc – Tony Juniper (Natural England), Lee Dillon MP, Olivia Bailey MP, Cllr Denise Gaines, James Wallace (River Action), Charlotte Hitchmough (ARK) and member clubs.

**Martin Salter, Head of Policy, Angling Trust**

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Photograph of the proposed site (marked) showing proximity to the floodplain.

