



**Subject:**  
**Date:**



21/00550FULL  
24 September 2021 15:19:27

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[REDACTED]

I wish to object to this planning application for the following reasons.

- This is further industrialisation of increasing proportions to our rural area.
- Deterioration of air quality, increased noise (we already hear noise from the chipping plant) and harmful emissions resulting from this development.
- In document "Supporting Statement-woodchip processing "the words "having the facility to dry varying products" is concerning. What other products- chicken litter? In a recent" Agent Commentary on letters of objection regarding 21/00337/FULM it is indicated that litter will be dried before collection. Or perhaps, green fodder crops? If this is the case, the air quality will be further compromised and ethical questions are raised such as loss of agricultural production to fuel a non-agricultural end product.
- In "Proposed Site Plan-Indicating Usage" document I note that there are two temporary timber storage areas indicated. Is there a plan for future use?
- In "Vehicle Movement" section, the number of customers indicated is 12. However, in "Number of Customers" document it is indicated as 14- all within an 8km radius?!
- The "District Heating Network" document mentions only one domestic property (Main Farmhouse) is mentioned as being serviced by existing Biomass. However, in "Biomass Boilers" document- domestic farm properties (plural) are mentioned. Are the two farmhouses and three cottages serviced by the existing biomass capacity?
- As applicant anticipates a rise in his customer base for wood chip, undoubtedly, this would result in greater supply of timber needed (Where is this sourced?). Also, vehicle movement will increase from increased customer base, increased use of wood chipping vehicles and plant and increased transportation of timber to allow the increased production.

Ian Grant  
Southpark of Gardyne  
DD8 2SR

# Comments for Planning Application 21/00550/FULL

## Application Summary

Application Number: 21/00550/FULL

Address: North Mains Of Cononsyth Cononsyth Arbroath DD11 3SA

Proposal: Change of Use of Land and Buildings from Agriculture to a Biomass Production Operation - Retrospective

Case Officer: Walter Wyllie

## Customer Details

Name: Mr John Bell

Address: East Mains of Dumbarrow Cottage Kirkden DD8 2SR

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:\* Why is this application retrospective, in that the development appears not to have gone through the process of prior application, and approval?

\* No neighbours have been notified of this development before it was built, and the supporting document 'List of neighbours notified' lists only the applicant's address. Why were nearby dwellings not informed beforehand ?

\* North Mains of Cononsyth is beginning to resemble an industrial estate, and is in danger of dominating what is otherwise a rural, agricultural landscape

\* The use of this 'biomass operation' is supplying product to a number of external customers, and is not for sole use in connection with the agricultural business of the farm. The applicant no doubt wants these external contracts to increase in number, which in turn will lead to more traffic in the area, plus noise and emissions from the plant itself

\* It is not clear from the Supporting Statement if the 'full time equivalent' employee represents the creation of a new job for someone, or if the management of this job has simply been absorbed by the existing workforce. Thus, there appears to be no economic benefit to the area, other than to the applicant

\* The Supporting Statement also mentions that this development has "the facility to dry other varying products". The applicant has another application currently with Angus Council, reference 21/00337/FULM, in which it has been mentioned that droppings produced by hens could be dried on site and sold to others for use as fertiliser. I would like it to be made clear that if application 21/00550/FULL is allowed to proceed, that it is conditional on the not being used to dry hen droppings.

\* Taking application 21/00337/FULM into account, where the estimated level of particulate emissions are very close to acceptable maxima, adding emissions from the biomass operation means that the level of particulate emissions from North Mains of Cononsyth as a whole are highly

likely to exceed environmental guidelines

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Address: North Mains Of Cononsyth Cononsyth Arbroath DD11 3SA

Proposal: Change of Use of Land and Buildings from Agriculture to a Biomass Production Operation - Retrospective

Case Officer: Walter Wyllie

## Customer Details

Name: Mr John Skilton

Address: Queenswood cottage Gardyne Fotfar DD8 2SR

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: To whom it may concern I wish to object to the proposed erection of an additional Biomass boiler Ref 21/00550/full North mains of cononsyth farm DD11 3SA

I already hear the excessive noise when the wood is being chipped for the existing biomass boiler on this site.

I am also concerned which other materials may be dried or burnt in this proposed boiler.

I.e. the chicken manure (waste) from the proposed 64,000 chicken factory farm, and the carcinogenic pollution of the surrounding area.

I chose to live in this beautiful country area of Angus, and feel it's being turned into an industrial factory farming area.

Thank you John Skilton Queenswood cottage DD8 2SR

# Comments for Planning Application 21/00550/FULL

## Application Summary

Application Number: 21/00550/FULL

Address: North Mains Of Cononsyth Cononsyth Arbroath DD11 3SA

Proposal: Change of Use of Land and Buildings from Agriculture to a Biomass Production

Operation - Retrospective

Case Officer: Walter Wyllie

## Customer Details

Name: Mr Mike Rushforth

Address: Summerhill House Guthrie Forfar DD8 2SR

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The Air Quality Impact Assessment (V1.1) submitted by COGEO Ltd. presents misleading information in terms of the PM2.5 levels of pollution relative to air quality objectives associated with this proposed development.

Table 3.1 quotes the Air Quality Objective for PM2.5 material to be 12 micro grams per cubic metre. However the levels quoted at Table 1.1 in the last two issues of the Technical Guidance Note 16 in the Local Air Quality Management Documents (Feb 2018 and Apr 2021) show that the objective for PM2.5 is in fact 10 micrograms per cubic metre. This invalidates all the calculations of "PEC as a % of AQO" in Table 7.5 in the COGEO report, because if the correct objective is used then the % values will be significantly higher and less favourable in terms of supporting the application. It does force one to question what other inaccuracies might be present in the report.

## **21\_00550\_FULL Change of Use of Land and Buildings from Agriculture to a Biomass Production Operation – Retrospective. North Mains Of Cononsyth, Cononsyth Arbroath DD11 3SA**

I wish to object to the above application for several reasons.

### Modelling Methodology

Regarding the Air Quality Impact Assessment<sup>1</sup> (AQIA) I question the validity of using data collected at Strathallan which is approximately 48 Km from the coast. North Mains of Cononsyth is situated 9 Km from the coast and as those of us who live in the locality are familiar with the fact that it is regularly subjected to coastal weather patterns, featuring onshore easterly winds and sea haars. These characteristics will obviously be absent from the data collected at Strathallan, but they would be expected to have a major impact on the dispersion of pollution from the proposed site and should be incorporated into the modelling process. Obviously, I disagree with the conclusion by COGEO in Section 6.2.3. that data collected from Strathallan can be considered “...*typical of the conditions generally experienced in this part of the UK.*”. Other historic PPC applications such as the Dundee Incinerator used data collected at Leuchars which may be more representative because it is further east and coastal relative to Strathallan.

### Source, Operational Hours and Emissions Data

It seems likely that Cononsyth will want to develop the biomass drying business if they are planning to install a second large (900 kw) biomass boiler. The Operation Hours in Table 6.4 account for less than 30% of annual hours available for the two smaller boilers and only 15% for the 990 kw boiler so there is plenty of available capacity before the installation of the fourth boiler. It would have been preferable to have some indication of the maximum emissions which might be achieved with an installation incorporating four biomass boilers. Using the data presented in Table 6.4 (Exhaust Specifications and Emission Rates) the fourth boiler will increase the particulate emissions by 41%, a significant increase. The applicant should be asked to provide analysis based on the worst-case scenario, all boilers operating on a two-shift basis. The AQIA<sup>1</sup> clearly states that there are occasions when all the boilers will be operated simultaneously. The applicant intends to operate this as a commercial operation and presumably will want to develop the business, hence the increase in capacity, and the hours of operation detailed in Table 6.4 appear to be extremely modest and unambitious but will help to provide favourable pollution data from modelling.

Regarding emission sources, the chipping process should also be considered as a source of pollutants other than noise. When the wood at Summerhill was cleared Cononsyth Farms positioned a chipping unit in the wood adjacent to our garden. During the operation of this chipping unit we were subjected to considerable noise, exhaust fumes from the chipping machine and most significantly dust. Plants in our garden and surfaces in our house were covered in a heavy layer of dust and particles in the air triggered an asthmatic response in me.

There are workplace exposure limits for the carcinogenic dust from both hardwoods and softwoods. The chipping process will cause particulate matter to be released into the air and should therefore also be considered as a source of pollution in these calculations. Again, this should be calculated on a worst-case scenario which considers the production of wood chip to match the total available installed boiler capacity, operating on a three-shift basis, forty-six weeks per year.

The chipping process inevitably generates a lot of noise and our neighbours in Mid-Park of Gardyne often hear the machine when it is operating. If it is intended to expand the boiler capacity and the volume of chipped wood produced, then this means that there will be more noise nuisance from both traffic and the chipping process. Conflict with **ALDP Policy DS4 Amenity**.

No mention is made in the proposal of ash disposal – what volume of ash will be produced and how will it be disposed of?

#### Visual impact

The additional building and incorporation of multiple exhaust stacks of increased height will further emphasise the industrialization at North Mains of Cononsyth. There are no other buildings in the area with this appearance until you get to the industrial estates in Arbroath. This conflict with **ADLP PV6 Policy Development & Landscape**.

Additionally, this represents the loss of another area of prime farmland, due to the erection of buildings and storage of input materials. This conflicts directly with **ALDP Policy PV20 Soils and Biodiversity**.

Whilst it might be considered reasonable to have a biomass boiler system for home-heating and drying cereal crops built on agricultural land, it is questionable whether a biomass boiler to be used primarily as part of an industrial process for producing biomass material represents sustainable development. This conflicts with **ALDP Policy PV6 Development in the Landscape**. The building of a unit which burns woodchip to dry woodchip to burn does not seem like a sustainable use of energy. Also, no mention is made of where the wood which is burnt is sourced from, which will have a major impact on the carbon footprint of biomass energy and whether it can be considered sustainable.

This unit could equally well be installed on an industrial estate and is contrary to **ALDP Policy DS1 Development Boundaries and Priorities** because the units could have been situated on brownfield land adjacent to Cononsyth House.

#### Cumulative effects

There is no acknowledgement that there is a proposal<sup>2</sup> by Cononsyth Farms Ltd. to build other industrial units (two chicken sheds housing 32k layers each) which will produce high levels of noise and pollution. SEPA made the following comment regarding air quality<sup>3</sup> associated with this proposal: *“An Air Quality Impact Assessment (AQIA) has been produced to support the planning application. The risk to human health from the development is considered by SEPA as acceptable on the basis that there are no predicted exceedances of the relevant air quality objectives. The modelled data show that although the predicted PM<sub>10</sub> concentrations are within the relevant air quality objectives, there is little headroom to allow for uncertainty in the modelled values.”* In fact, the situation is more critical when the emissions of PM<sub>2.5</sub> are considered. The combination of these two applications conflicts with **ALDP Policy DS4 Amenity**.

In view of this “lack of headroom” I believe that all forms of pollution from the proposed hen shed development should be incorporated in the modelling used in this application. Additionally, SEPA should pass opinion on this biomass development relative to the hen shed proposal, even though no individual boiler exceeds 1mW capacity, because there will be a combined capacity of 2.74mW which in conjunction with the proposed chicken sheds has the potential to have a major impact on air quality in our area. All calculations on air quality will have been made assuming that all the boilers are operating at optimum efficiencies, irrespective of their age and level of maintenance applied. If the development is approved, then it would be reassuring to know that the plant was being operated efficiently, monitored and conditional that no emissions from the stacks of smoke or fumes should be evident. Also, permission should only be granted for the operation of the boilers in line with the times detailed in Table 6.4.

### Angus Local Development Plan

This proposed development conflicts with many areas of the local development plan:

#### **ALDP Policy DS1 Development Boundaries and Priorities**

#### **ALDP Policy DS4 Amenity**

#### **ALDP Policy PV6 Development in the Landscape.**

#### **ALDP Policy PV20 Soils and Biodiversity**

### Use of Acronyms

There is the repeated use of acronyms in the COGEO report. In my experience it is common practice to either introduce the acronym at first time of use or include a glossary, even in a report aimed at professionals in the field. The use of acronyms in a public facing report like this, without explanation, can only be interpreted as either lack of attention to detail or obfuscation.

### References

1. Air Quality Impact Assessment. COGEO Planning and Environmental Expertise. Applicant: Cononsyth Farms Ltd. Version 1.1. 01 June 2021.
2. Proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packing facility, vehicular access, access tracks, drainage and landscaping at Field 530M West of North Mains Of Cononsyth Farm, Cononsyth, Arbroath Application Reference: 21/00337/FULM
3. Communication. Alasdair Milne (SEPA) to Ruori Kelly (Angus Council Planning) "Consultation Request" 09 June 2021. Angus Planning Portal.

M. A Rushforth  
Summerhill House  
DD8 2SR  
15 September 2021



# Comments for Planning Application 21/00550/FULL

## Application Summary

Application Number: 21/00550/FULL

Address: North Mains Of Cononsyth Cononsyth Arbroath DD11 3SA

Proposal: Change of Use of Land and Buildings from Agriculture to a Biomass Production Operation - Retrospective

Case Officer: Walter Wyllie

## Customer Details

Name: Ms Morag Malcolm

Address: Summerhill House Guthrie Forfar DD8 2SR

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object on the following grounds:

1. The existing biomass plant has been developed on prime agricultural land without seeking planning permission, contrary to the Angus Local Development Plan (ALDP) Policy DS1 that such development "will only be supported where there are no suitable and available brownfield sites capable of accommodating the proposed development". Cononsyth Farms Ltd. had access to large areas of brownfield sites on their land when this biomass boiler installation was first considered.
2. Biomass boilers emit fumes, especially nitrogen dioxide and particulates and the likelihood of odours from the driers. When the chipping process is also considered, plus the additional traffic associated with the expansion of this business, there will be a considerable increase in windblown dust and other particulates in the locality. (See requirements of ALDP Policy DS4 Amenity.)
3. There is vagueness about what materials other than wood and cereals, will be processed and whether they are likely to give rise to offensive odours. In the absence of further information, the site should be restricted to these activities. (Again, see requirements of ALDP Policy DS4 Amenity.)
4. No information is presented about where or how the wood is sourced. As the business is developed and the capacity of the plant increases more wood will be required from further afield, for example other parts of the UK and abroad. This represents an additional, serious environmental impact and further reduces the sustainable nature of the activities being carried out on prime agricultural land (Policy DS1).
5. The developer has not provided enough information to estimate the overall efficiency of the plant.
6. Because the developer has also applied to build intensive chicken sheds nearby, appraisal of the total environmental impact of the combined project must be made evident (ALDP Policy PV6.)

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Application Number: 21/00550/FULL

Address: North Mains Of Cononsyth Cononsyth Arbroath DD11 3SA

Proposal: Change of Use of Land and Buildings from Agriculture to a Biomass Production Operation - Retrospective

Case Officer: Walter Wyllie

## Customer Details

Name: Mrs Valerie McMillan

Address: Summerhill Cottage Guthrie Forfar DD8 2SR

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would like to object on the following grounds:

There already exists a Biomass boiler on this site, which, when in operation produces considerable noise when wood is being chipped, a further unit would increase noise levels significantly.

I am very concerned about pollutants being emitted when wood chips are being burnt.

There is also an application for a proposed 64,000 poultry unit, my concern would also be that chicken manure from this would be dried causing unknown pollutants into the atmosphere, affecting residents in the area.

I feel that our beautiful countryside is becoming over-industrialised, ruining a peaceful haven to reside in.