

Comments for Planning Application 21/00024/FULL

Application Summary

Application Number: 21/00024/FULL

Address: North Mains Of Cononsyth Cononsyth Arbroath DD11 3SA

Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mrs Alison Skilton

Address: Queenswood Cottage Guthrie By Forfar DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I strongly object to this planning application as I feel this, along with the other planning applications submitted by Cononsyth Farms (21/00019) and the proposed construction of two factory farm sized hen houses is turning this lovely rural area into an industrial site. This proposed development will not only impact on my enjoyment of my home and this lovely rural area but create noise and air pollution, increased heavy traffic on narrow country roads and also have a negative impact on the house values of those of us living nearby.

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mrs Ann Grant

Address: Southpark Of Gardyne Cottage Kirkden Forfar DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:As this is a rural agricultural community I feel that turning it into an industrialised area is a negative move which will impact on residents well being.

The proposal for the Boiler and Flue were registered on 18/1/21 by V.Caney, Technical Assistant, Angus House, Planning Service. On 28/1/21 an acknowledgement letter was sent to scott@hydroscot-energies.co.uk for the above submission. Air Quality Supporting Information as seen in documents dated 19/2/21 show a different set of data to original above proposal e.g. both building and flue heights have been increased. My concern that this is not the original proposal and data has been altered.

Applicants energy supply, at present, seems sufficient to service North Mains and recently acquired Mains of Cononsyth. Cononsyth Farms have a pre application for 2x IPU's, a short distance from this biomass boiler and shed development. Is this new development's increasing energy to accommodate and support the application for the chicken sheds? It's difficult to separate the two applications(the Biomass and IPU's)-are these developments linked? If so, I feel a full open planning application would be more appropriate in this instance.A letter from Martin Petrie(Environmental Health Officer)to Walter Wyllie(Case Officer) suggests there is potential for loss of residential amenity and impact on air quality locally with the introduction of this 900kW

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Case Officer: Walter Wyllie

Customer Details

Name: Anni Whitehead

Address: Midpark of Gardyne Guthrie Forfar DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to Cononsyth Farms Ltd. installing a further biomass plant. It is industrialisation of the countryside. I have asthma, biomass emits particulate matter and I am very concerned this will be exacerbated by the emissions. I know first hand that biomass emissions are not what are promised and deteriorate over time. It will further increase background noise, in addition to other plant at North Mains of Cononsyth. The wind turbine there is already sounds like constant aircraft in our house when wind is from the east. I will find the additional noise of the chipper, compressors and pumps unacceptable. My amenity and enjoyment of the area will deteriorate with the increased noise, dust and unsightly nature of more industrial buildings when we are taking daily walks past the farm. I work from home and the tranquility and clean air are key to several aspects of my work. I question that development such as this fits with current legislation and emerging policies on climate change; biomass is not carbon neutral. It is ridiculous that no neighbours have been identified, we are about 800 metres away. When this application is seen in conjunction with the application to build a boiler shed and the planning application notice for an enormous IPU (intensive poultry unit) that requires a heat source to dry chicken litter I wonder that these are all interlinked and it would be disingenuous of the applicant not to say so. I note the expiry of application for RHI (renewable heat incentive) payments for non-domestic biomass is at the end of March and I take it the applicant wishes to take advantage of that. The timing of this application would also imply the applicant is prejudging the decision by Angus Council on the IPU proposal, as the current energy needs of the farm are already met by their current plant. This would mean Angus Council are actively encouraging works to commence in advance of permission being granted.

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mr Darren Reddington

Address: South Cottage Gardyne Arbroath dd11 3rx

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the over industrialisation of our rural area by the continual construction works proposed by Cononsyth farms. The existing infrastructure already produces intrusive noise pollution in our rural area.

Our understanding is that manure from the proposed chicken sheds will be stored and dried in these buildings this will cause unacceptable odour issues for those of us downwind.

The road network is already being damaged by heavy agricultural vehicles ,installation of this biomass plant will only exacerbate these problems .

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mr David Liddell

Address: Mid Park of Gardyne Forfar DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the installation of a biomass boiler at North Mains 21/00024/FULL. This is based on the fact that I have not been notified, and feel the application is directly linked to the industrialisation of my local area by Cononsyth Farms Ltd. Especially the proposed Intensive Poultry Units which will be using the heat and electricity from the biomass boiler (ref PAN 20/00811). Burning trees on the scale proposed is at odds with Angus Council's commitment to Scotlands Climate Change Declaration, and the UK Governments Clean Air Strategy. I see that no near neighbours have been contacted about what is going to be a noisy (from chipping the logs, compressors and pumps) and dusty in terms of fuel, traffic and smoke. In other words, a nuisance as its visual appearance is of heavy industry.

I am already bothered by noise from Cononsyth Farms wind turbine, especially at night, I feel it has a detrimental effect on my mental health. I feel the industrialisation planned by Cononsyth Farms is out of place, because nothing like it exists in our area and Angus Council is giving the green light to what is not sustainable. Where are all the trees going to come from?

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mr GRAEME MCLEAN

Address: Narvik East Cotton Gardyne Arbroath DD11 3RX

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Installation of boiler will add further noise pollution to an area already impacted by noise from the wind turbine and existing wood processing sheds constructed by Cononsyth Farms.

I have further concerns on the impact on air quality, and when taken into account with the other planning applications submitted by Cononsyth Farms for an extension to the existing sheds and construction of a further two large sheds as an intensive poultry unit that there is an overdevelopment of our rural area.

Further development on this scale will add more traffic to a rural road network which is unsuitable for the size and volume of vehicles, as well as having a negative effect on our ability to enjoy our rural environment.

It is disappointing that we have not received any communication in advance about these plans, despite the negative impact they will have on our community.

East Cotton of Gardyne
Arbroath, Angus, DD11 3RX.

18 February 2021

Planning Service
Orchardbank Business Park
Forfar.
DD8 1AN

Dear Sirs,

Comments for Planning Application 21/00024/FULL

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Address: North Mains Of Cononsyth, Cononsyth, Arbroath DD11 3SA

Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

I share the concerns tabled by other members of the public within the local community and object to the proposed installation of a biomass boiler and associated works detailed in the planning application referenced above.

Key elements of my objection:

- 1) The development seems at odds with one of the broad themes on which the ALDP Policy framework is structured, viz:

“Protected and Valued: making a low carbon, natural and resilient place – reducing our carbon emissions, adapting to climate change and protecting and enhancing our natural and cultural assets.”

- 2) The need for and purpose of the biomass boiler and turbine has not been fully demonstrated. It is not clear to me how this is considered agricultural activity or directly associated with it. I do not believe clarity on this matter is an unreasonable expectation given the emissions from the biomass boiler would be similar to 225 homes (each having a 4kw wood burning stove fitted) continuously burning wood (24/7, 365 days per year). Domestic wood burning generally only takes place in the colder months of the year so given the continuous use of the biomass boiler the actual impact is likely to be worse. I have been troubled by the emissions from the existing combustion plant on site on several occasions during the last few years. I am not keen on further expansion of this activity.
- 3) The literature provided on the Heizomat Biomass boiler RHK-AK (sales brochure) provides minimal detail and no evidence to support the claims therein, e.g. >90% efficiency (efficiency of what, how was that determined, constant efficiency or best measured efficiency in the sweet spot of the plants operating curve). In my experience efficiencies of between 70 – 80%

would be more likely from such plant. As a minimum the specific “efficiency” of the plant quoted should be described and the methodology for its derivation demonstrated.

- 4) Combustion material standards are quoted but no detail of the actual feedstock is provided. It is essential to know what the feedstock will be (exact specification to be achieved at all times) and how this feedstock will be managed to provide a consistent feed that will deliver optimal performance. The fuel transport, storage, processing and management should also be addressed – what further areas of storage, increase in storage capacity and fuel processing movement are associated with the proposal?
- 5) The Net Rated Thermal Input (MWth) of the biomass boiler is not presented, only the power output is detailed (900kW). The net rated thermal input of the selected unit (900kW output) should be demonstrated to determine if the biomass boiler should be characterised as Medium Combustion Plant which if within the range (1 - 50MW) may require a permit from SEPA under the Pollution Prevention and Control (Scotland) Regulations 2012 (as amended).
- 6) Notwithstanding any requirement for a permit, in relation to biomass combustion plants, SEPA states *“the planning system has a pivotal role to play in ensuring that combustion plants are appropriately located, screened for air quality impacts and avoid the declaration of Air Quality Management Areas (AQMAs)”*. I am very concerned by The Air Quality Screening assessment supporting the planning application which requires further consideration and scrutiny, viz:
 - a) The location of the proposed Biomass boiler is cited as “grid reference NO 357435,746997” which relates to a location near Loch Wharral. This mistake may have arisen by conflicting grid references with eastings and northings.
 - b) Even using eastings and northings the location of the building on the farm is at odds with the location plans, i.e. placing the Biomass boiler closer to the Farmhouse on the site and further away from neighbouring properties (perhaps the original intent and better location).
 - c) The background values for PM₁₀ and NO_x relate to those associated with a 1km² at “GR 346500 746500”. If this square is actually at E 346500, N 746500 it is several miles from the proposed development (Mains of Easter Meathie near Fotheringham Hill).
 - d) LAQM TG (09) states that Local authorities have control over smaller industrial and commercial sources, largely through the Clean Air Act, with its associated control of the stack heights. Moreover, it states that the focus should thus be on new installations and those with significantly changed emissions. LAQM TG (09) Box 5.5: Updating and Screening Checklist for industrial sources states that *“Particular attention should be paid to the combined impact of several sources, including those outside the local authority area. The approach to the assessment will depend on whether an assessment has been carried out as part of the planning or permitting process. The assessment should consider all of the regulated pollutants, although those most at risk of requiring further work are SO₂, NO₂, PM₁₀ and benzene.”* This is a concern for the following reasons:
 - i. No “Particular attention” has been paid to the combined impact of several sources (other existing industrial sources on and off the site or other new

sources like the poultry farm proposed by the applicant in another planning application). It should be noted that LAQM TG (09) specifically flags poultry farms as a source of PM₁₀ and highlights that some local authorities have identified potential exceedances of the PM₁₀ objectives associated with emissions from them. This is particularly concerning given LAQM TG (09) is a UK wide document and PM₁₀ objectives in Scotland are lower than those in the rest of the UK.

- ii. While the existing combustion plant(s) on the site may not be new they are a source of emissions that have not been accounted for.
 - iii. No specific attention has been paid to other emissions from the proposed biomass boiler, e.g. PM_{2.5}, CO, CO₂ etc. While CO and CO₂ may not be a concern in relation to LAQM, they are in relation to climate change.
 - iv. No estimate of what proportion of the PM₁₀ is PM_{2.5} has been presented.
 - v. No local authority monitoring data other than that derived from Scottish Air Quality reports has been presented and as previously described that relates to a different location.
- e) The Building height (8.7m) included in the Biomass Screening Assessment Criteria does not correlate with the building height (roof ridge height) in the Elevations / Flue Stack plan ref. HSE-NMC-003 (scale suggests the building height is around 12m). Using the quoted PM₁₀ emission rate of 0.0134g/s the annual mass emission rate is likely to be in the region of 0.4 tonnes per annum. In line with LAQM TG (09) given the stack height is less than any adjacent building within 5 actual (physical) stack heights distance, the local authority will likely proceed to a Detailed Assessment as the emission is greater than 0.01 tonnes per annum. Increasing stack height may be tabled as a solution but that course of action presents a different set of concerns.
- f) The plant specific information used to determine the emission rates is not presented.
- 7) The air quality screening calculations submitted with the application have been undertaken using the BV tool (spreadsheet). The nomograms used in the tool require the use of the effective stack height, which is defined in Box 5.6 of LAQM TG (09), the BV tool / nomograms cannot be used if the building height, H, is greater than the actual stack height U_{act}. The building height (roof ridge height) in the Elevations / Flue Stack plan ref. HSE-NMC-003 is in excess of the stack height and while no true measurement to roof ridge height is presented the scale suggests the building height is around 12m.
- 8) The Heizomat brochure includes no details of the anticipated emissions from the biomass boiler and burners or the conditions that would be required to be maintained to achieve these. This is relevant to determining stack height and potential impact on air quality.
- 9) The cumulative impact of the emissions from the proposed biomass boiler have not been assessed in conjunction with existing combustion plant and material storage.
- 10) The type and source of fuel over the life of the plant is a valid planning consideration and has not been characterised in detail. Without this no conclusions on sustainability or climate

change / net zero agenda can be reached. Quoting from Angus Council guidance *“The ecological risks of bioenergy generation will strongly depend on the type of feedstock used and the management system applied, but all have the potential to increase greenhouse gas emissions and cause habitat loss.”*

11) In addition to normal agricultural activity there are several noise sources on the farm at present, e.g. wind turbine, raw material (fuel) handling and processing for and operation of existing combustion plant. Further raw material handling and processing will increase / sustain associated noise.

12) What provisions are in place to prevent future upgrades e.g. larger grate / bigger fan.

I would welcome a letter outlining how my concerns will be addressed and am very happy to discuss any of the matters raised above.

Yours faithfully,

A large black rectangular redaction box covering the signature of the sender.

Guy Heaton.

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mr Jake Stewart

Address: Kirkden Schoolhouse, Gardyne, Guthrie, Forfar DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to lodge my objection to this planning permission (and by association with Shed extension ref 21/00019/PRIORN) on the basis that these developments are clearly a prior step to the proposal of the erection of 2x32000 chicken shed (ref PAN 20/00811) which is in pre proposal stage. These proposals are linked and should be considered in the round and not as separate issues. I do not believe this proposal is in good faith or in keeping with the ethical ways in which planning proposals should be progressed. When I questioned Cogeo the planning consultant about the energy requirements and sustainability of the PAN 20/00811 they were very guarded with their reply saying energy was to be provided by existing biomass, a windmill, and new solar panels. They would not provide calculations. It appears to me now the reason for this is that the original chicken shed design underestimated the energy requirements and this new biomass boiler and its encapsulating shed are need to meet the short fall. This is a disingenuous or deceptive measure by either the applicant and or the consultant.

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Ms Kerry Dunlop

Address: South Cottage Gardyne Arbroath dd11 3rx

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: my objections to the development are

pollution - noise, light, air

increased traffic in a quiet rural area

increase in localised flooding

smell - storage of chicken muck, chicken muck as fertiliser on the fields in the local area

increase in vermin and how this will be controlled

the negative effect on the wellbeing and mental health of our community

as an immediate neighbour of the proposed development I feel I should have been notified and it has not slipped my attention that this is related to the proposed chicken shed development and planning application 21/00019/PRIORN

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mrs Lorraine Mcconnachie

Address: 9 heather bank Friockheim Dd114we

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I think a vast chicken farm in this location is going to be harmful for the environment, for the infrastructure of roads and the pollution coming from the farm.

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mrs Lorraine McLean

Address: Narvik East Cotton of Gardyne Arbroath DD11 3RX

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My concerns regarding this application are:

- ~ Noise pollution - noise pollution already exists from the wind turbine and the wood processing sheds
- ~ Air quality - couple this with the other planning applications submitted by Cononsyth Farms for an extension to the existing sheds (21/00019/PRIORN) and construction of a further two large buildings for chicken farming (scoping)
- ~ Over industrialisation and over-development on our rural area - we moved here for the peace and quiet, not to listen to industrial noise (not to mention the negative impact this will have on house prices in the area)
- ~ Traffic impact - road network is unsuitable for the volume of traffic and size of vehicles this will bring. It will also have a negative impact on neighbours being able to enjoy our rural area.

Despite the negative impact this, and other planning applications mentioned, will have on our rural area and community we have not received any communication prior to, or at the time of, these applications being submitted, which is very disappointing.

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Dr 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: I object to the installation of this biomass boiler system because I do not believe that it makes a contribution to the UK's goal of achieving a Zero Carbon economy by 2050. Angus Council must play its part in achieving this goal and seriously question the wisdom of developments of this type.

It is now generally recognized that biomass fuels cannot be considered as "carbon neutral" and this rush to embrace this technology in the 2000's has not led to a reduction in emissions of carbon dioxide equivalents. When this proposal is taken into account with existing biomass combustion on site, and the proposal to build a large intensive poultry unit which will have a massive carbon footprint, the applicant will become one of the major producers of greenhouse gases in this rural area.

I am particularly concerned about the generation of particulate matter caused by the applicant's activities which are known to have a major impact on health of receptors. I believe that this can occur both in the shredding process and also in the combustion products of the process. What controls will be in place to ensure the optimum moisture content of the biomass material to minimise PM2.5?

We experienced the issues with particulate matter in the shredding process personally when the applicant chose to shred felled timber in the wood adjacent to our house a couple of summers ago, and our garden and house were covered in coarse and fine particulate matter which adversely affected my asthma. Whilst we are not usually affected by the shredding process carried out on site, receptors downwind will be affected and steps must be taken to protect them. Finally, it is difficult to believe that this proposal is totally divorced from the proposal to develop an

intensive poultry unit in the locality and that, as such, it should be incorporated as part of that planning process so that an honest environmental impact assessment can be made.

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

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 have concerns about the particulate matter that will be associated with the emissions from the boiler and their impact on my health as a vulnerable neighbour to the plant. There is no mention of the type of biomass which will be used to feed the boiler and I am aware that this can have a major effect on concentration and type of particulate matter created. The applicant has indicated that he will submit a planning application for an intensive poultry unit (IPU) and there are recognised issues with the cumulative levels of NOx and particulates where biomass units and IPUs are in close proximity.

I do not see how this application can fit with the UK goal to become a Zero Carbon economy, when this unit will be issuing a plume of carbon dioxide and other pollutants for the next 20+ years.

The unit will have a significant impact on the levels of traffic in the area and is yet another step in the industrialisation of rural Angus, negatively impacting on the health and amenity of local residents. How does this contribute to:

- Safe, secure, vibrant and sustainable communities?
- A reduced carbon footprint?
- An enhanced, protected and enjoyed natural and built environment?

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Proposal: Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 10.5m Flue

Case Officer: Walter Wyllie

Customer Details

Name: Mrs Val 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 object to this planning application. I have grave concerns regarding the emissions that will be released into the atmosphere, these particles can be hazardous to health and as I live in close proximity to this site this will obviously affect me.

There will be an increased volume of traffic in the area which is normally a quiet location.

Noise levels will increase.

No notification has been received regarding this planning application.

Our quiet rural area is becoming industrialised, no longer a quiet peaceful haven, along with two proposed IPU's in the same vicinity where will this end.