

From: [REDACTED]
To: [PLANNING](#)
Subject: Scrap Factory Farming
Date: 17 June 2021 08:37:34

FAO Ruari Kelly. Case officer Angus council.

Objection to:

21/00337/FULM | 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 | Field 530M West Of North Mains Of Cononsyth Farm, Cononsyth, Arbroath.

Dear Ruari and the Planning Committee.

Please accept my objection to the above planning application.

The future looks grim.

- More pandemics.
- A climate raging out of control.
- Environmental damage.
- Biodiversity loss.
- Global food poverty and UK food insecurity.
- Antibiotic resistance - antibiotics used to keep animals in cramped, unhygienic conditions alive until slaughter.
- Animal mutilations without anaesthetic and no chance of a normal life.

The science is clear. Factory farming of animals is a leading cause of all the above.

With this in mind, I write to ask you to protect our children from serious problems that will dominate their future if we do not act now. Not just pandemics but the climate crisis, environmental problems, antibiotic resistance..... it's a horrific picture.

The climate crisis is here but the greatest impacts of it will be felt by our own children. Biodiversity is being lost, environments destroyed, soil quality diminishing. Pandemics are already a threat and antibiotic resistance is growing.

I OBJECT strongly to this application.

Yours faithfully
Annette Lillig
Edinburgh EH 16 6YE

Comment for planning application 21/00337/FULM

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

Having moved into the local area and been made aware of the proposed construction at Cononsyth, **we wish to lodge our objection to the planning application (21/00337/FULM) in the strongest terms.** This is based on a number of factors, which I hope you will consider below. We feel that each in turn should give significant doubt to the suitability of the construction, and when considered as a whole we hope clearly explains our objections.

Climate Change and the Environment

In the year that Scotland hosted the 2021 United Nations Climate Change Conference (COP26), public awareness and understanding of the significant issues around climate change has never been higher nor more invested in change. If we are to meet global carbon dioxide and nitrous oxide emissions targets, and therefore limit the damage caused by the climate change crisis then we must make positive environmental decisions, and support our farming community in sustainable development. Scotland have taken a lead in terms of renewable energy, should also be at the forefront of measures which support sustainable farming and public health, and not encourage the industrial farming that that is proposed at Cononsyth.

It is clear from Angus Council's own stated sustainability agenda(1) that the council aspire to encourage a sustainable way of life within the municipal borders. This proposed development is counter to this vision.

[1]: Angus Council (unknown) **Sustainability Strategy.** <https://www.angus.gov.uk/the-environment/sustainable-angus/sustainability-strategy>.

While emissions are broadly within EU emission guidelines, the independent review of Scottish air quality noted that there "are still serious and particular challenges around transport constraints, nitrogen oxides, particulate and ammonia levels (from agriculture), and aspects of public behaviour and our choices, given options available and perceived, which need to be tackled."(2) Annual DEFRA reports confirm(3) the significant parts of the country which have critical levels of ammonia, in particular.

[2]: Rowe EC, Sawicka K, Tomlinson S, Levy P, Banin LF, Martín Hernandez C & Fitch A (2021) **Trends Report 2021: Trends in critical load and critical level exceedances in the UK.** Report to Defra under Contract AQ0849, UKCEH project 07617. https://uk-air.defra.gov.uk/library/reports?report_id=1020.

[3]: Gemmell Prof C, et al (2019) **Cleaner Air for Scotland Strategy – An Independent Review.** Report to the Scottish Government. <https://www.gov.scot/publications/cleaner-air-scotland-strategy-independent-review/>.

The Food and Agriculture Organization of the United Nations acknowledges(4) the global shift towards industrialised poultry farming. It also makes it clear that some side-effects are inherent in industrial poultry farming: "Local disturbances (e.g. odour, flies and rodents) and landscape degradation are typical local negative amenities in the surroundings of poultry farms."

Odour, in the form of ammonia and other compounds, will impact the local area dependant on a number of factors including prevailing winds. The FAO highlight that this is "generally concentrated

within 500m” of the source. According to the plans provided, our property is approximately 300m from the centre of the development.

Flies (the FAO cite US research with recorded 83 times more than average within 1/2 mile (800m) of poultry facilities) and other insects are a nuisance but can also spread disease. Again, our property falls well within the area of concern.

Rats, and other vermin, are also vectors for disease and have a negative effect on other local wildlife, putting pressure on an already struggling ecosystem; and the potential use of pesticides can cause local environmental pollution and further impact biodiversity.

The carbon dioxide and nitrous oxide emissions associated with not only the frontline farming, but also the chicken feed production and transportation, egg transport, and then the annual carcass disposal of the no longer profitable hens, is considerable.

Clearly there are mitigations that can be taken to reduce the impact of some of these issues, but in conclusion the FAO paper includes comment that “[g]enerally, the environmental impacts of the sector are substantial. Poultry production is associated with a variety of pollutants, including oxygen-demanding substances, ammonia, solids, nutrients (specifically nitrogen and phosphorus), pathogens, trace elements, antibiotics, pesticides, hormones, and odour and other airborne emissions.”

[4]: Gerber P, Opio C & Steinfeld H. (2007) **Poultry production and the environment—a review**. Animal production and health division, Food and Agriculture Organization of the United Nations, Viale delle Terme di Caracalla, 153. http://www.fao.org/ag/againfo/home/events/bangkok2007/docs/part2/2_2.pdf.

These issues are particularly pertinent to our property as consideration of the prevailing wind suggest that we would often be facing the brunt of any gaseous and particular emissions. Coupled with the extremely close proximity to the site boundary and approximately 300m distance to centre of the planned development, it seems we are most at risk from insect and rodent infestation.

All of this will be in addition to any noise increases due to the development and the planned fan operation, which seems to have been discounted as negligible in the reports generated for the applicant - but, given the 24 hours a day operation, will doubtless have an impact on an otherwise tranquil setting.

Local Land Use & Planning

The change of use from prime arable land to industrial farming appears to be at odds with the broader goals of Angus Council, and the Angus Local Development Plan(5) in particular. It does not promote farming diversity, and likely removes a large area of prime land from having a positive impact on the local environmental for many years to come.

[5]: Angus Council (2016 etc) **Angus Local Development Plan**. https://www.angus.gov.uk/directories/document_category/development_plan.

In addition, the proposed site does not extend an existing building group, and is an industrialisation of a currently greenfield site. This is in direct contravention of Angus Council advice on siting farm buildings - "Do not build in isolation[:] Farm buildings should preferably form part of, and relate to, an existing group of buildings.”(6)

[6]: Angus Council (unknown) **Advice Note 1: Farm Buildings**. https://www.angus.gov.uk/media/farm_buildings.

The local area contains a significant amount of standing water, and this is likely to increase as changes in the global climate result in greater precipitation rates across the country. A cursory visit to various locations around the proposed site will show signs of localised flooding, standing water, a high water table, and already inadequate drainage. There is significant concern that further development will have a negative impact on local water levels, but also result in increased pollutants in existing water courses, including the Denton Water.

The stated vehicle access requirements seem to be conservative, but even if as stated in the planning application, it should be noted that the access road [U467] is unsuitable for regular access by large articulated vehicles, and would not be improved with a small number of passing places being added. The narrow, un-edged carriageway is currently in reasonable condition, but increased heavy traffic will have a significant detrimental effect on the infrastructure as well as the many walkers, cyclists, and other recreational users in the area.

Additionally, it seems disingenuous to have conducted a traffic survey at the B961/U467 junction during January 2021 - the height of winter during a national lockdown in response to a global pandemic. The results of this survey should, at the very least, be considered wholly unreliable as an indicator of the volume and speed of traffic that would be expected at that junction.

Despite our property being amongst the closest to the planned development, it was surprising that there was no visualisation created from this location. It would be informative to understand the full visual impact of the proposed development, including the planned sheds and ancillary building features such as silos, solar panels, etc., but also highlighting the extent of the planned ranges, and demonstrating the associated fencing that would also be erected. Given the proximity of our property to the site boundary, if the site was correctly and fully visualised then I suspect that such a visualisation would not be as inoffensive as some that were produced.

The Scottish Government's advice on the "prevention and control of emissions to the air" state that "[w]hen designing new buildings, consider their siting in relation to residential accommodation, and avoid sites within 400m of such developments. Where possible, sites downwind of residential areas should be chosen."⁽⁷⁾ Given our property is neither over 400m away, nor downwind of, the proposed development it seems that such a development should not warrant further consideration on the planned site.

[7]: Scottish Government (2005) **Prevention of environmental pollution from agricultural activity: guidance**. Section 13, para 13.14. <https://www.gov.scot/publications/prevention-environmental-pollution-agricultural-activity-guidance/>.

Public and Personal Health

As well as the environmental impact, emissions associated with industrial farming has been linked to risks to public health⁽⁸⁾.

[8] Smit LAM, Boender GJ, de Steenhuijsen Piters WAA et al. (2017) **Increased risk of pneumonia in residents living near poultry farms: does the upper respiratory tract microbiota play a role?**. *Pneumonia* 9, 3. <https://doi.org/10.1186/s41479-017-0027-0>

The recent, well-publicised, increase in cases of avian bird flu across the UK, including recently within Angus⁽⁹⁾ and other areas of Scotland raises further questions. Not only does this risk the health of hens within a planned development, but it then further increases the risk of transmission to local wild bird populations, local small scale poultry operations, and ultimately also to humans⁽¹⁰⁾. Indeed as much as 70% of all new infectious diseases are zoonotic (transmitted from other species to humans)⁽¹¹⁾.

[9]: Scottish Government (2021) **Avian influenza (bird flu) outbreaks**. <https://www.gov.scot/publications/avian-influenza-outbreaks/>.

[10]: Kile JC, Ren R, Liu L, et al. **Update: Increase in Human Infections with Novel Asian Lineage Avian Influenza A(H7N9) Viruses During the Fifth Epidemic — China, October 1, 2016–August 7, 2017.** MMWR Morb Mortal Wkly Rep 2017;66:928–932. DOI: <http://dx.doi.org/10.15585/mmwr.mm6635a2>.

[11]: Wang LF, Crameri G (2014) **Emerging zoonotic viral diseases.** Rev Sci Tech. Aug;33(2):569-81. <http://dx.doi.org/10.20506/rst.33.2.2311>.

Increased industrial poultry farming activity clearly increases the chance of poultry to human transmission of viruses. The cross-species transfer of the then novel SARS-CoV-2 coronavirus 2019 is an all too real reminder of the potential risks of not properly managing our poultry and livestock farming.

As an asthma sufferer, already prone to pneumonia and having worked from home for the majority of the last two years on medical advice due to respiratory vulnerability, it's naturally concerning that living a mere 300m from the proposed development will increase the risk to my health still further.

From the global to the very personal, we believe that there are a raft of reasons why this proposed development should not be approved. We therefore very much hope that the planning application will be rejected.

David & Kenna Smith
South Mains of Gardyne
DD8 2SR

Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

Customer Details

Name: Mr David Boyd

Address: 6 Farm Steading Leysmill DD11 4RR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The village of Leysmill is subject to HGV traffic cutting through it to join onto the Montrose to Arbroath Road. I have concerns that this type of traffic will increase with more HGC traffic required for this farm.

Ruari Kelly

From: Jake Stewart [REDACTED]
Sent: 23 June 2021 09:43
To: Ruari Kelly
Subject: Re: Objection to Ref. No: 21/00337/FULM
Attachments: Comments on the EIA, expanded.docx

Ruari,

Good morning and apologies for a slow reply to your confirmation e-mail. I have been speaking with my fellow neighbours over the critique/comment document previously supplied. In this regard we would like to have this document published on the Council site. I have tidied up the document and reduced the data size which I hope makes it easier to handle. The contents are exactly the same. Please find attached.

kind regards,
JAKE STEWART

Comments on the EIA, expanded

Ref 2.1

This Environmental Impact Assessment Report (EIA Report) has been prepared as part of the Environmental Impact Assessment (EIA) compiled seeking planning permission from Angus Council for the erection of two agricultural units at North Mains of Cononsyth to accommodate 64,000 free range hens for egg production. Cononsyth Farms Ltd are seeking the construction of two 32,000 capacity free-range hen sheds to expand their rural business operation on land at North Mains of Cononsyth, Arbroath, DD11 3SA. The site of the development is at Summerhill, not North Mains of Cononsyth; some 750 metres separate the two places. Throughout various documents the applicant and agent seem to be attempting to conjoin the two places, making it seem as though the development is contiguous with the buildings at North Mains of Cononsyth, when that is not the case.

Ref 2.1(f)

A Non-Technical Summary has been compiled and is submitted as a standalone document for ease of distribution to interested parties. A separate Planning Statements reviews the development against national and local planning objectives, whilst the Pre-Application Consultation Report (PAC Report) details the community consultation undertaken for this proposal in line with Government guidance. Whether or not the 'community consultation' was in line with Government guidance, it was in fact wholly undemocratic and not fit for purpose, with interested parties being unable to join in for lengthy periods of time, questions being answered in an opaque and evasive way, and all without opportunity for proper discourse as befits a major planning application. Furthermore, when residents opposed to the development told Cogeo that they wanted to quote verbatim copies of the on – line chat on their website, they were told 'no', on the grounds that the information was confidential, despite the residents stating that they would completely anonymise the information. It is difficult to see how copies of the word for word text of a public consultation could be considered confidential, however Cogeo have since said that what the residents proposed to do would breach the GDPR regulations, which is completely incorrect. This restriction, which was not further challenged by the residents for fear of litigation, directly contravenes the notion of free speech and obscures the issues around the application from other interested parties.

The imbalance created by Cogeo's restriction is reflected elsewhere in the planning processes around this application, and while there are several areas of dissatisfaction, there are a couple which stand out.

The first is that local residents have not had any formal support from the Community Council, as could reasonably have been expected. For unbeknown reasons, Friockheim Community Council, in whose area the development lies, is currently not functioning. The neighbouring community council in Letham has rebuffed all requests for support or assistance, leaving the residents somewhat adrift, in having to teach themselves about council procedures, and documentation, all without any advice.

Secondly, we need to consider the respective time scales and resources available to the relevant parties. There were 104 days from the date of the public consultation, on the 28th January, to the 12th May, the date that formal notice of the development was served on local resident. During that period the applicant, his agent, and their various sub – contracted specialists, had the opportunity, pretty much at their leisure, and with considerable financial resources, to prepare the best possible case for this development to proceed.

Local residents, unfunded in any way, and without outside assistance, have just 21 days (from the formal notice) to prepare their best possible opposition to the development.

Ref 3.4

This is through the use of the litter produced by the hens being reused on the farm as fertiliser, where it is currently hauled in from external suppliers. The hens will be fed with cereals grown on the site as well as utilising energy from the farm's renewable and sustainable sources to power the units. This reduces costs to the business whilst also reducing the carbon emissions from transport. The volume of litter that will be produced by the hens far exceeds the maximum which can be applied to the land at Cononsyth, and the feed requirement of the hens will exceed that which can be grown at Cononsyth. In the case of litter, this means that the excess will have to be stored or removed from site for use elsewhere, meaning that Waste Management regulations will need to be applied. In the case of feed, the shortfall in production means that additional feed will have to be transported in, These sheds will not be by any means self – supporting or exclude the need for extensive shipping in and out.

Ref 3.4

Cononsyth Farms Ltd. has a preliminary contract in place for the supply of free-range eggs from the site. With large retailers committing to a total ban of cages hen egg sales by 2025, there is a move towards the deployment of high-quality free-range egg units throughout the country in suitable locations, with high welfare standards and high specification sheds to enhance the countries food supply. This is a business matter not a planning consideration, or so we were told during the 'consultation' when questioning similar matters with Cogeo, who refused to address any questions about the economics and business practices surrounding the application, The comment above has no place in the planning application, and should not be considered. For balance, however, it is worth mentioning that there are many articles in the farming press advising against continuing the development of free range egg production. In an article in The Scottish Farmer, on 14th October 2020, it was reported that the British Free Range Egg Producers Association had warned that increased development of free range egg production was (in their words) unsustainable. BFREPA CEO Robert Gooch said: "There is an incorrect assumption from many in the sector that retailers moving away from colony eggs will lead to a surge in demand for free range. That is simply not the case, and this report confirms that. The trend is clear; as production has increased, the price paid to farmers has decreased. This situation is unnecessary and unsustainable."

It seems to the residents that this development will be financially unsustainable at the very least.

Ref 4.2

The proposed development site consists of flat ground continually planted as crops with overwintering cover planted at the time of application. An existing track from the unnamed road along the western boundary runs along the southern fringe of the woodland provides access to the development site. Whilst works will be required to enhance the track with the addition of more hardcore material, the route is established and runs to what would be the rear of the sheds. This track is a recent development, not previously existing, and produced in the last few months by the applicant to enable the destruction of the ancient wood referred to above, which also required the destruction of a large section of old dry stone wall.

Ref 4.4

The hens require a range of 32ha, 20% of which needs to be planted in trees to comply with the standards of free-range egg production. Each shed is divided into 16,000 hens with all requiring range access in accordance with the Scottish Government codes of practice for the welfare of laying hens. This means there must be sufficient spacing requirements surrounding the sheds as well as within the units. The land take of the unit is such that a number of locations were discounted due to the lack of available space which meant that standards could not be adhered to and the hens would not meet the requirements for free-range classification. This section does not mention specifically which other locations were discounted, so at the moment this is simply an assertion, and should not be regarded as factual. The counter assertion is that there are several other areas on the applicant's land which would be practical in terms of land take. There is no mention either of other areas, elsewhere in County Angus, where this development could be accommodated, for example on brownfield areas or now – redundant poultry units. The applicant has farming business interests elsewhere in the County, and there is no reason why this development needs to be at Cononsyth, given its 'standalone' nature

Ref 4.4

The orientation and positioning of the access is an important biosecurity and disease control mechanism for the operation of the units with vehicles unable to cross the range area. There is also a requirement for suitable access for egg collection, food delivery and litter removal that needs to be suitable for HGVs. Existing access from the unnamed road allows vehicular access to the area outlined for the sheds with only minor upgrading works required. The entrance from the unnamed road is of sufficient width and construction to allow safe entry and egress from the field as demonstrated by the regular use by large farm and forestry machinery. The unnamed (actually the U467) is barely wide enough to take an HGV, and as the edges are not curbed they are going to crumble and degrade quickly. At least three passing places will be necessary between the site and the B961, to accommodate traffic to the site and that of local residents. A better choice of site would be at North Mains of Cononsyth, where there is already easy access from the B961, and vehicles would not need to cross the range area here, either. Also, which other areas were discounted for reasons of poor roads / access?

Please refer also to the expanded appendix, "Roads"

Ref 4.4

The sheds require water and electricity which are available at the proposed location but not throughout the land holding. The internal mechanisms including lighting, egg collection and packing, fans and feed all require electricity with the hens requiring a constant supply of drinking water. Water is available via the farm's existing irrigation system and a three-phase electricity supply currently terminates at the wind turbine at the nearest point. There is a ready supply of both water and electricity at North Mains of Cononsyth, and part of the alternative development area is very close to the turbine. **Which** areas did the applicant discount for the above reasons, including those in other parts of County Angus ? .

Ref 4.4

The sheds themselves also require level ground for construction due to the internal mechanisms for the collection of eggs and distribution of feed and water within the buildings. More undulating areas of the land holding were discounted due to the extensive earthworks that would be required to level the site to the appropriate standard. Topographically, the proposed site offers suitable conditions for the construction of agricultural units and external hardcore apron without significant ground or levelling works. The applicant's land has a fairly uniform slope, and the development would be just as easily accommodated elsewhere. Also, as the building site will have to be levelled some excavation will be necessary wherever it is placed. Which other locations did the applicant reject as being unsuitable, including those away from Cononsyth altogether, including brownfield farm sites not currently in use, including other similar but now redundant units ?

Ref 4.4

Accounting for third-party residential properties, the development site is set-back an appropriate distance to ensure environmental effects are negated whilst visual effects are minimised. There are a number of third party receptors that can be affected by noise, odour and emissions which limits both the position and potential orientation of the sheds to ensure that there are no negative effects on these third party receptors. A number of locations were discounted due to potential impacts, with the proposed development area demonstrably compliant with all amenity guidelines. It is incomprehensible that the environmental effects can be described as negated. Nearby residents will have to tolerate vehicle noise, disturbance of various sorts (the access road runs on the other side of someone's garden fence, for example), plus the visual impact of the buildings and the site as a whole, even given the proposed 'screening'. Once again there is no mention of which specific areas were considered and discounted, nor the reasons for their being discounted.

Ref 4.4

An additional consideration within the siting is the productivity of the ground. As the development requires 32ha of range to be included as part of proposal this represents a significant loss of potentially productive arable land. Although this is being replaced by an alternative food yield, as an arable farm, productivity of ground is of utmost importance to Cononsyth as a business. However, regardless of management practices, the development area in question produces much lower yields than other areas of the land holding. This development will diversify the land use in the vicinity of the lower yield, continuing agricultural activity yet through animal husbandry with external ranges. **Where is the evidence for the lower yields, bearing in mind that any reduction would need to be demonstrable over a few years to be recognised as significant? Lower yields have been used as an attempted justification for similar applications elsewhere in Scotland, and are seen as a potential loophole to justify development on prime agricultural land, As the applicant's assertion is unsupported by any facts we should not simply be taking the applicant's word for it.**

Ref 4.4

Accounting for the above noted factors, the area outlined to accommodate the development is considered to be the most viable and suitable within the land ownership boundary of the Applicant whilst minimising environmental and landscape effects to acceptable levels. Recognising that the immediate and surrounding landscape consists of, and is characterised by its working nature, intrinsically linked to agricultural practices, the Applicant sought to present a suitable proposal to Angus Council which ensures the continued success of a rural family business with minimal impacts to sensitive receptors within the local and wider area. **Throughout all of the above it has not been specified which other areas have been considered, nor has it been mentioned **why** they have been rejected, so all we have at the moment is the word of the applicant and his agent, which is not satisfactory. ALDP specifies that an applicant should make it clear which alternative sites they have considered, and what the reasons are for their rejection. This application does not do any of those things.**

Ref 5.2.1

Daily inspections will be conducted to assess hen health, with monitoring systems in place to notify stockmen of any issues to be address. **Who will be carrying out the daily inspections, and how and where will these be documented and made available for public scrutiny?**

Ref 5.2.3

Each shed is arranged internally to separate the hens into groups of 16,000 per side, with popholes along the side walls to allow for access to the external range area afforded to the units. In accordance with the regulations specifying the required outdoor range area afforded to each hen, the development site has been designed to accommodate the range within the surrounding fields. Sporadic tree planting will be implemented within the Range to provide shelter and shade for the hens when outdoors with post and wire fencing marking the boundary. Cover provided within the range will allow the hens to express their natural behaviours, with fencing ensuring security from prey. Planting will also contirbute towards reducing run-off, emissions and visual effect. **So, it is then acknowledged that the development will produce emissions. We need to be clear exactly what these emissions will be, what quantity is anticipated, and how these will be routinely monitored and provided to sensitive receptors so as to provide constant reassurance. It is also difficult to see how tree planting will help reduce emissions; please explain.**

Ref 5.3

The unnamed road along the western boundary of the site is recognised as a single-track route with available passing places at field entrances. Whilst these passing places are adequate for day-to-day road use with movements of tractors and large farming vehicles being a regular occurrence, the Councils Roads Department seek upgraded passing places to ensure road user safety. To address the requirements sought by the Roads Department, upgraded passing places have been proposed by the Applicant to be installed during the construction phase of works, pre-development onsite. **If the development goes ahead, who will be paying for the development of the U467; hopefully not the taxpayer? Also, it should be noted that because of sight lines on this road, at least three, and certainly two passing places will be necessary, which will inevitably result in the destruction of many metres of ancient dry stone wall and all the wildlife contained therein. The EIA should therefore include the verges between Summerhill and the B961.**

Ref 5.4

Any water requirements within the units will draw on the existing connections at the site, with the existing field irrigation systems utilised where possible. SEPA Consultee response states what whilst waste management issues are dealt with under the PPC Permit arrangements, it is recommended that the EIA Report provides information on waste arrangements for the proposal for reference. All washout from the shed will be completed to the rear of the units (eastern elevation), utilising the swales which have been specifically designed in accordance with guidance by *JJP Environmental Services*. **What is proposed to manage and control the run off and odour from the washout?**

Ref 5.5

The units will require a full-time Stockman to be employed onsite, available to undertake the daily activities involved with the operation. Daily inspections will be conducted to assess hen health, ensure ventilation and ambient conditions are maintained within the units, collection of eggs laid on the ground in error, walking the fencing to ensure no damage to the boundary, and opening the popholes to release the hens in the morning and closing them at night to keep the hens safe. Animal welfare is of utmost importance, and with monitoring systems in place to notify Stockman of any issues to be address, speedy response is necessary. With the units in close proximity to the main farmhouse, quick action will be possible from the Applicant/Stockman. **Where will the Stockman be living?**

Ref 6.3 and table 6.4

Description of the measures envisaged to prevent, reduce and where possible, offset any significant adverse effects on the environment. **No outline of the main alternatives have been provided to interested parties, and at the moment all we have is the word of the applicant and his agent that this has taken place** The discussion on alternative sites, including any not on the Cononsyth estate needs to be in public view

Ref Table 7.1

Medium	Undulating landscape where the existing sense of scale may be affected by development of inappropriate scale or location. Locally recognised landscape, though undesignated. Identified in landscape study as having some sensitive key landscape characteristics, however able to accommodate development in some situations.
High	Landscapes containing sensitive and designated sites, such as Gardens and Designed Landscapes, National Scenic Areas. Rare landscapes of high value with a distinct character. Tranquil or remote landscapes noted to be vulnerable to change within Landscape Character Assessment.

An estimation of where the proposed development fits in this table, as the size, scales and location of the buildings will dominate and irreparably alter the local land rather than 'fit in' and complement it

Ref Table 7.2

High	<p>People who are engaged in outdoor recreation, whose attention or interest is focused on the landscape and on particular views (e.g. strategic footpaths, cycle routes or rights of way, picnic areas, public viewing areas).</p> <p>Residential properties with principle views from main living rooms and gardens.</p> <p>Important landscape features with physical, cultural or historic attributes.</p>
------	--

An estimation of where the development fits in this table, as there are at least 12 dwellings with direct line of sight from their main rooms and gardens to the proposed buildings

Ref 7.3.7

The nature of development proposed, within the hosting rural scene dictates that it is unlikely to be viewed as a negative or detrimental addition to the landscape or visual amenity. This is a remarkably naive, simplistic and subjective statement, and is obviously intended to support the applicant and his agents view. None of the sensitive receptors have been asked for their opinion on the above, and I am sure that had they been then the replies would have been entirely in the negative. The development in no way adds to the landscape and view in a positive or even neutral way, as it will be completely out of character with what is there currently. The proposal is effectively turning a relatively quiet and tranquil farming area into an industrial estate

Ref Table 7.3

High	<p>Where the proposal would cause a significant change affecting the character of the landscape or key characteristics.</p> <p>Size of development would be wholly out of scale with existing features.</p>	<p>Dominant visual change.</p> <p>Results in a defining influence on the view.</p>
------	---	--

An estimation of where the development fits in this table

Ref 7.4

The methodology devised by Cogeo for assessing the effects of a developments is not reliant on the use of matrices to determine the significance of landscape and visual effects. It is, however, considered useful to include a matrix in the methodology to illustrate how combinations of sensitivities and magnitudes of change can give rise to a significant effect and also provide a threshold at which significant effects may arise. Experienced professional judgement is applied to the assessment of all effects and reasoned argument is presented in respect of the findings in each case. Table 7.4 discusses the criteria for Significance of Effect. We need to have clear sight of the methodology devised by Cogeo, presented in jargon – free layman's terms. Cogeo's method is no doubt constructed in such a way as to favour their business activities and that of their clients, and it would be helpful to have an impartial assessment carried out, using a method other than Cogeo's, which amongst other things includes the opinions of local residents

Ref 7.4.1

Combined Visibility occurs where a receptor is able to view two or more developments from a single viewpoint. These views can be further refined; in combination, when several developments are within the receptors field of view at the same time and in succession where a receptor has to turn to see several developments from a single location.

Sequential effects occur where a receptor is moving through a landscape and is able to view two or more developments. Receptor has to move to another viewpoint to see different developments. Both combined and sequential visibility are at play here, as there are several sensitive receptors who can see more than more than one of the applicant's recent developments from their homes, and many more people who can see more than two within a few minutes' walk or drive of each other. The cumulative visual effect of the applicant's business and planning activities are therefore significant, in that they are beginning to dominate the area.

Ref Table 7.5

The retention of existing habitat is encouraged, therefore through careful siting considerations the development can proceed without the removal of valuable vegetation. The land within the LCT is deemed as one of the most fertile and productive agricultural areas in Scotland, with much of it being classed as prime agricultural land used primarily for arable farming. The footprint of the development will result in the permanent and irreversible loss of land, though given the scale of the development within the context of the LCT, this loss is negligible in scale. The agricultural nature of the development is in keeping with the rural setting and will not significantly impact the landscape as it will be read in conjunction with the pattern of wider development. Farm buildings are generally of a large scale, however the hen sheds proposed are lower in overall height than sheds located throughout the local area designed for storing locally grown produce. Whilst not within particularly close proximity to existing development in the immediate vicinity, the overall character of the LCT is unaltered by this proposal. Effects on the local area will create a barely perceptible change to the wider LCT, with no alteration to the fabric of the landscapes rural character.

Nature of Effect	Low	Significance of Effect	Minor
------------------	-----	------------------------	-------

All of the above is really subjective and, in some instances actually incorrect. Fundamentally, it is impossible to justify the construction of a huge industrial building of the approximate dimensions of Station Park, Forfar FC's ground (the whole thing, not just the pitch) in rural farmland, and to further claim that it complements existing buildings and will have negligible effect on the landscape.

Ref 7.6.1

Upon review of the landscape, it is possible to declare that although views are mapped as being achievable, in reality the visual envelope of the development would likely be much less widespread. Although topography limits receptors to the south of the development site, visibility to the north, east and west would be contained by the presence of woodland in the local area. Furthermore, views of the hen sheds from the majority of surrounding residential properties will likely be screened or filtered by intervening vegetation. Fleeting views are likely from the local road network to the east of the development site, however again these will be filtered by natural and man-made features present in the landscape. This is misleading; it is difficult to see how the view of the proposed buildings from the north, east and west can be described as screened, when at best this is only in part, and at worst there will be a clear and unobstructed view of the buildings, and of the free range and its associated fences. The man - made features mentioned above as 'filtering' the view of the development from the east are in fact some of the applicant's own recently developed buildings

Ref Tables 7.7 to 7.13

At every possible opportunity the EIA downplays the significance that the development may have on the visual amenity of the area, and over - emphasises how little impact there may be. The following phrases are selected from the tables, as follows ..

" where receptors will be able to appreciate the association of the hen sheds with the wider farming works at Cononsyth Farms Ltd ...

" .. scale of the development means that it is likely to be a clearly evident change to existing views, but without significantly diminishing the quality of the view" ...

"Whilst the full structure of the hen sheds will be visible, the height of the units will complement the existing landform and will be seen to mould into the landscape as the land rises to the south"

" ... the units cannot enhance the view, but conversely the agricultural nature of the development is not at odd with the landuse, nor the scale of existing development within the region ..."

"The separation between the three developments and the remaining open land surrounding each ensures that whilst there is an increase in development within the vista, the view is neither cluttered nor over-developed"

. The sheds will be clearly read as an agricultural development within this rural setting.

" Although not associated with existing development, the scale of the structures ensures that the sheds do not appear an isolated or remote feature, rather as a self-contained expansion"

" the structure remains sufficiently distanced and settled so as not to be a central feature of the view. It could not be concluded as prominent,, "

"The scale however is in keeping with the horizontal flow of the woodland and trees ensuring that the sheds do not appear prominent or intrusive to view"

"Only gable end views of the southern hen shed are attained"

Significant aspects of the views from various locations, and the impact this will have on the various residents is being obscured by the use of flowery and anodyne language. It needs to be borne very much in mind that this is a huge building, the approximate size and shape of Station Park, and its appearance and impact cannot simply be airbrushed out of consideration in the way that the applicant and his agent are attempting.

Ref Table 7.14

Table 7.14 Discounted Viewpoints

Viewpoint Location	Stage	Reason for exclusion
Mains of Gardyne	Scoping	Extensive vegetation surrounding residencies to the east and south.
Dumbarrow Mains	Scoping	Vegetation to the east of the residencies.
Fairfield Mains	Planning	Restricted access and intervening vegetation to the west

The dwellings at Fairfield Mains are amongst the closest to the development, and really do need to be taken into account, and the 'intervening vegetation' will be insignificant in preventing the occupants seeing the buildings. Although access is not public, efforts should have been made to gain access

Ref 7.6

Given the nature of this development, the impact will be long term with the hen sheds operating as part of Cononsyth Farms Ltd, a successful farming business in rural Angus. There is no specific operational lifetime for hen sheds and as such the residual impacts are considered to be permanent. This loss of land is relatively small scale and irreversible, although the landscape is capable of accommodating this development. The plantation of trees can be determined as being of benefit to the local setting with no wider loss of landscape features as a result of the development. Although the sheds themselves may have no pre-determined lifetime, it is likely that economic fluctuations the free range egg business may render this development to be unsustainable. Plans should therefore be in place detailing how this building, and its accompanying pollution, will be decommissioned. Plans detailing how the surrounding free range is going to be decontaminated of hen fouling should also be provided. It must not be forgotten that the development is on prime agricultural land, which is a precious resource, and to consider effectively writing it off in this way is very poor indeed, especially when there is no evidence that alternative sites have been considered

Ref 7.7

As the wider site is relatively flat and vegetation limited, 6.4 acres of native trees will be planted within the range area with further planting along the site boundary (see site plan) to minimise the visual impact of the development on sensitive receptors. Once the screen planting has matured, this will provide a level of screening and filtration of views from recognised sensitive receptors in the area. General planning conditions are likely to be utilised to limit the hen sheds to an appropriate recessive colouration which will ensure that this matches the characteristics of the landscape and surrounding agricultural buildings. Whilst tree planting is to be encouraged, the figure of 6.4 acres is very misleading, as the applicant has already destroyed approximately 7 acres of mature ancient woodland directly adjacent to the development site, destroying in the process the wildlife habitats therein, as part of his undoubted preparations for the development going ahead

Ref 9.1

This chapter addresses the potential impact posed by the development at Cononsyth on sensitive ecological species and habitats within the surrounding area. Following the Scoping Opinion issued by Angus Council, a Phase 1 habitat survey was deemed necessary as part of the EIA report, accounting for the full extent of the development site including the adjacent woodland plus a 30-metre buffer. Angus Council also requested that a tree survey was undertaken to inform the impacts on trees from the access track. **A couple of points here: 1) the habitat survey needs to include the verges and stone dykes up to Mains of Cononsyth, as they will be directly affected by the development, 2) the tree survey was utterly pointless, as the applicant had already destroyed the wood adjacent to the proposed access track**

Ref 9.2.2

The extent of protection varies between species but of greatest relevance to planning authorities are those species whose places of shelter are protected from deliberate or reckless damage, destruction or obstruction and which are protected from disturbance while in such a place of shelter. Schedule 8 of the Act lists plant species which are specially protected. **Several months ago, in destroying the ancient wood adjacent to the proposed access track at Summerhill, the applicant has removed known populations of red squirrels, badgers and bats, which have been confirmed to have been present by local residents. This is in direct contravention to various pieces of legislation, and could be regarded as a cynical act by the applicant to prevent objections of this sort arising during the application process**

Ref 9.5.1

Following the walkover survey, it is concluded that this site does not present a valuable or sensitive habitat for native plants and animals. There are no populations of protected species within the application site or likelihood of a resultant displacement. Plant populations on-site are of relatively low importance and impact upon such as a result of any proposed development will be minor. Given the low ecological value of this development site, no further ecological surveys are suggested. **Overall, the habitat survey seems barely to be fit for purpose. The desk – based study will offer very little in terms of up to date information, and the site survey seems to have consisted of a single visit, presumably over 2 or 3 hours, during the day time, employing no specific sampling systems (for insects, for example), at a time when most flora are in recession, and relying on nothing more than a walk – through. The survey also failed to include the 900 or so metres of ancient overgrown dry stone dyke on both sides of the road leading up to Mains of Cononsyth and the B961. Further work is obviously necessary.**

9.8.3

The site is entered via a minor metalled road which leads onto the B961. There is an existing broadened area (25m x 20m) of hardcore hardstanding on farmland at the minor metalled road end of the proposed development access track route. This would afford adequate vehicular access and turning in/exiting manoeuvres space for heavy vehicles. **Is a person conducting a habitat survey really qualified to comment on roads and access?**

Ref 9.8.6

In cognisance of these respective Tree survey data returns, it follows that all construction and site maintenance heavy traffic exceeding 2 tonnes gross weight should be limited to a minimum RPA Diameter near-side distance of 15m (11m + a 4m buffer). The near edge of any section of temporary or permanent access track running adjacent to these south-side broadleaved plantation trees should be at least 11m apart from any individual tree. For construction plant and materials of maximum combined local weight 2 tonnes or less it is suggested that the minimum near distance to these trees can be safely reduced to 10m provided that a BS5837 tree root pressure barrier (e.g., a sacking mulch barrier) edge is first put in place. **If understood correctly, the implication of the above is that the near edge of the track leading to the proposed buildings should be at least 15 metres from the adjacent edge of the wood, in order to accommodate vehicles over two tonnes in weight which will be most of the construction vehicles and vehicles eventually servicing the site. This likely means the destruction of a further section of dry stone dyke**

Ref 10.1 et seq

This chapter addresses the potential ammonia and air quality effects of the proposed development on the environment. A separate Air Quality Impact Assessment is attached (Appendix 10.1) and should be read in conjunction with this chapter (i.e., EIA Report, Chapter 10: Air Quality).

There are several residential properties nearby the proposed development site, and ten SSSI/SAC designated habitats within 10km. As a result, the impact of emissions on sensitive receptors within the area is assessed within reporting. Assessment is subdivided into effects on human health, and the environment (designated habitats). **Why does this assessment take into account the possible effects of pollutants on sensitive designated habitats within 10 Km of the development site, but only within ca 1Km for residential properties? This gives the impression that more importance is placed on the natural habitat than human health. This could be of critical importance for some nearby individuals who have respiratory problems. The assurances given in the rest of section 10 are no more than assurances, based on what is assumed to be best practice and industry standards of machinery. What is proposed for routine measurement of air quality, at least at the nearest sensitive receptors and over a range of greater than 1Km? It also should be borne in mind that pollutants can have an effect upwind from the prevailing direction, and routine sampling needs to be undertaken in all directions, not just (prevailing) downwind**

Ref 11.5.3

Within the scoping opinion, Angus Council requested an assessment on the potential impacts associated with spreading manure on surrounding farmland. The development site is located within rural Angus, dominated by arable farmland where it is common practice for farmers to use fertiliser on their fields. Chicken litter is recognised as a superior alternative to standard inorganic fertilisers as it contains high levels of organic nitrogen, phosphorus and potassium which can improve physical and biological fertility of soil.

Cononsyth Farms Ltd. currently imports chicken litter from a local supplier for use as a fertiliser on the arable farmland at North Mains of Cononsyth. It is proposed that the farmer will use the chicken litter from the hen shed operation at Cononsyth as a by-product, reducing the carbon footprint of the operations by eliminating the requirement for fertiliser to be imported to the site. The litter produced within the hen sheds will be dried within the units, reducing its weight, volume and odour, and will be collected by the farmer and transported to an off-site store away from sensitive receptors.

The quantity or frequency of spreading on land will not change because of the operation of the hen sheds at Cononsyth. Manure currently spread will be replaced with that collected at the farm, continuing the accepted land management practice. Once spread, manure will be ploughed into the soil, as this can reduce the emissions by up to 90%³⁸. Mitigation measures to alleviate impact to sensitive receptors will be set forth within the Odour Management Plan submitted to and regulated by SEPA.

Some notes on the above, and the proposed use of chicken manure are as follows:

Total remaining farm area excluding the development site and the range is 167 hectares

Maximum recommended application rate per hectare per year of guano is not more than 3 tons per hectare, and $167 \times 3 = 501$ tons

Chickens produce ca 120Kg droppings per 1000 birds per day, which $\times 64000$ birds = 7.68 tonnes per day, therefore $501 / 7.68 =$ just over 65 days

... ie the hens will produce sufficient droppings to adequately fertilise the land in 65 days ...

in other words the development will produce ca 6 x the weight of droppings than can be spread on the land without polluting effects being significantly increased, a factor which will not be reduced by the waste having been dried beforehand

Furthermore, the consideration above excludes the acreage currently supporting honeyberries and that occupied by existing buildings. The 'over - production' of chicken litter for the purposes of use as a fertiliser at Cononsyth, is probably nearer 7 x rather than 6.

Given that the continued accumulation of litter will soon exceed storage capacity at Cononsyth, the implication is that the waste will have to be removed from site for storage and use elsewhere.

It is understood that SEPA's responsibility for 'overseeing' this material stops at the farm gate, so therefore the applicant will presumably be deemed responsible for all overseeing all aspects of the management of this waste including transport, storage, and eventual use, and be legally accountable for its misuse.

There should be a proper 'manure plan' for all aspects of dealing with this waste as outlined above, and including all the sensitive receptors on the margins of all the fields where this material is going to be applied.

Added to this, large parts of County Angus include areas defined by the Scottish Government as a Nitrate Vulnerable Zone, ie areas where the concentrations of nitrate in water exceed, or are likely to exceed, the levels set in the Directive.

Mandatory rules, set out in Action Programmes, must be enforced to reduce nitrate loss from agricultural land and to protect human health and resources from water pollution. Given this extreme sensitivity, it seems to make little sense to promote an activity which will add even more nitrates into the environment and / or to be vague about how nitrate levels will be routinely monitored wherever hen litter is to be applied

Ref 13.2.3

Local borehole records in the vicinity of the development show sandy clays extending to a shallow depth of 2m overlaying sandstone extending to a depth exceeding 40m below ground level.

Soakaway testing has been undertaken in order to determine whether the ground conditions are suitable for soakaways/infiltration methods to be utilised for the disposal of surface water run-off from the development. The results of the soakaway testing showed that **ground conditions are unsuitable**, with the water level in the trial hole not falling to 50% depth after 24 hours.

A study of the groundwater maps shows that **the development site does not overlay an aquifer** or lie within a groundwater vulnerability zone. Despite what is written above, there are nine wells recorded in the early 1800's either on or very close to the northwards downslope from the development area, including one right at the development site. Three of these are still viable wells, and a fourth is still used as a water source for two nearby dwellings. This seems to strongly indicate there is an aquifer beneath the ground, and the development therefore poses a direct risk to the water quality and, in one case, to the two households actually using that water. Furthermore, it is concerning that one of two of the wells are very close to Denton Burn, suggesting they are part of the same sub - surface water feature, creating an increased risk of pollutants making their way, unseen, to Denton Burn. Please refer to the accompanying document, 'Wells and groundwater' for further details

Please refer also to the expanded appendix, "Water"

Ref 13.4.1

The preferred option for the disposal of surface water run-off from the development is for disposal to soakaway.

Percolation tests were subsequently undertaken in order to assess the suitability of using soakaways as a means of disposal of surface water run-off from the development. The percolation testing has revealed that the underlying strata is unsuitable for soakaways/infiltration trenches to be used. Presumably because the water does not 'soak away', suggesting that short term drainage, for example in the case of heavy rain, is over the surface rather than underground.

The second preferred option would be to discharge the surface water run-off from the development to a watercourse. There is an open drainage ditch located to the north of the new buildings within the area of the development, which drains the adjacent agricultural land. It is therefore proposed that the surface water run-off from the new development is discharged into this drainage network. As mentioned above, the drainage of the development area and its surrounds are characterised by a network of small, unremarkable ditches and culverts, and it is very unlikely that these have been properly mapped and the directions of flow fully understood. It is important that this ditch is accurately identified to the benefit of all concerned, as its likely proximity to Denton Burn and the potential for river pollution is concerning

Ref 13.4.1

It is a requirement to ensure that the quality of any receiving body is not adversely affected by the development. In order to minimise the risk of pollution entering any watercourse, the rainfall run-off from the roof areas of the new agricultural buildings should discharge directly to the sealed below ground drainage network (i.e. no gullies) and consequently the risk of pollutants being discharged to the ground water is extremely remote. Run off from the concrete paving will be collected via trapped gullies and will also be discharged to a sealed below ground surface water sewer system via a filter trench. This is contrary to what is written above ... "There is an open drainage ditch located to the north of the new buildings within the area of the development, which drains the adjacent agricultural land. It is therefore proposed that the surface water run-off from the new development is discharged into this drainage network" Which option is being proposed?

Investigations have revealed that the development site does not overlay an aquifer or lie within a groundwater vulnerability zone. What investigations? As stated previously, there are several wells nearby, suggesting a viable aquifer

Discharge to a watercourse enables dilution to take place at the discharge point and thus reduces the likelihood of pollution occurring. This is nonsense, as if polluted water flows into another water course, that in turn pollutes the receiving water course

In order to minimise the risk of pollutants entering the watercourse, it is recommended that the final inspection chamber prior to the discharge to the watercourse should contain a silt trap. The final inspection chamber should also incorporate a collection point for regular and frequent water analysis to ensure that no pollution is occurring. The date from this analysis needs to be made publicly and easily available.

Ref 13.4.1

An hydraulic model study of the new drainage network has been undertaken in order to assess the required pipe sizes and gradients and to calculate the volume of storage which will be required. A copy of the hydraulic model calculations is included in Appendix 13.2. The calculations show that the volume of storage which will need to be provided to accommodate the 1 in 200 storm event, plus climate change is 326m³.

The required storage will be provided within an attenuation lagoon constructed to the north of the new buildings. Layout drawings of the proposed drainage network and attenuation lagoon are included in Appendix 13.3.

There are numerous concerns about how accurate these estimations actually are, as follows:

The concerns we have are around the uncontrolled passage of water over and around the site, in a way that will cause pollution of water courses, and movement of contaminated earth

Residents who have lived nearby for 30 or more years report that the rainfall level in this area has increased significantly, to the extent of causing localised flooding several times a year, where previously this happened just once every two or three years.

Once saturated, the heavy clay soil will not absorb more water, and run - off occurs over the surfaces of any down slope, taking top soil with it, along with anything else on the surface, which will include hen fouling

The nearest meteorological station to the south (1) operated by SEPA , is at Hume Farm, Carmyllie, just 4.6Km from the site. At the time of writing this station has recorded 778mm of rain, 2.66 feet, in the 'rolling year' May 2020 to May 2021. This is a conservative estimate, as the equivalent figure from the rain gauge at Colliston, 4.4 Km from the site, is 957mm for 2020, or 3.14 feet

The applicant is planning to build on a concrete slab which measures approximately 110 x 100 metres - 11,000 square metres, which means that over a year, the hard standing + buildings will receive and have to manage approximately $11,000 \times 0.778 = 8558$ cubic metres of water, based on the lower rainfall figure from Carmyllie.

The highest daily rainfall recorded at Carmyllie in the period from May 2020 to May 2021 was 37mm, meaning that the 11,000 square metres of the site will have received 407 cubic metres ($11,000 \times 0.037$) of water on that one day, which far exceeds the 326 cubic metre capacity of the proposed attenuation lagoon.

The 326 cubic metre capacity of the lagoon will be exceeded if there is ever more than 29mm of rain in a short period within any one day. This has happened once in the month 21/4/21 to 21/5/21, plus two other occasions there the daily total was just 3mm and 7mm short of the crucial volume. At Colliston, there has been on day where the rainfall was just 6mm short of the crucial volume.

What is proposed seems barely able to accommodate a 1 in 200 year event, with the likely result being overspill onto the surface and subsequent run off downhill

Ref 13.4.1

The run-off volume post development should be no greater than pre-development. The run-off volume from the developed site for the 1 in 100-year 6-hour rainfall event **should also not exceed the greenfield run-off volume for the same event**. However, as detailed, it is considered that the lowest discharge rate which can be used to avoid future blockages and maintenance issues is 7.2litres per second. **This assumption is incorrect, as no allowance is made for compaction of the upper layers of the soil by the hens, and their removing or damaging turf as part of their normal behaviour, Post development surface run off will exceed significantly that at present, and this seems to be acknowledged in the paragraph below**

Whilst the greenfield equivalent will be marginally exceeded at peak storm events, this should not cause any issues due to the agricultural nature of the surrounding land. **Local knowledge, and experience of recent very heavy rain over the last three years at least, indicate that there will be significant surface runoff, and an increase in sub – surface discharges. Local residents disagree strongly with the statement below**

We consider that the impact on the receiving watercourse has been adequately minimised.

Ref 13.4.2

The new egg packing building incorporates amenity facilities including a toilet and wash hand basin. A separate foul water drainage outfall will therefore need to be provided.

There are no public sewers in the vicinity of the development and consequently an appropriate foul wastewater treatment plant will need to be provided, with the treated wastewater discharging into the ground. Formal consent for the discharge will need to be obtained. **What regular and frequent testing will be done to ensure that the discharge is of acceptable quality?**

Ref 14.7.1

Recommendations for the instalment of passing places was presented within the Scoping Opinion issued by Angus Council. Early engagement with the Traffic Department within the Council confirmed the specifications of the passing places to be investigated along the roadway; *Passing places should be formed to provide a minimum carriageway width of 5.5-6.0m and cater for the largest type of vehicle to be used in the delivery of components/materials to the site. The standard sized passing place of 12m plus 1 in 3 tapers ought to suffice.* The passing places would be formed and constructed in accordance with the council's road standards which is deemed for permanent use. **Who will be paying for the construction and ongoing maintenance of the passing places, hopefully not the taxpayer, as their creation would be as a direct result of the application**

Appendices:

Roads

The purpose of this section is to outline our concerns about the proposed road access to the development site, and to query why no alternatives have been mentioned

The principal issue is that access to the site is via approximately 790 metres of single track unclassified road, the U467, the average width of which is three metres. At its southern end, the U467 meets the B961 33 metres south of a dangerous 120 degree bend, and approximately 33 metres north of a blind crest. The speed limit on this stretch of the B961 is 60mph

Heading north from the site, the U467 maintains the same width for approximately 3.8Km to its junction with the A932. During that distance the U467 rounds five acute bends and crosses two weak bridges. The turning off the A932 is already signposted 'unsuitable for large vehicles'

It seems likely that all traffic to and from the site will be off the B961

The U467 forms the main southerly route to Arbroath and Dundee for 27 houses which are either directly by the side of it, or up a track from it.

In addition to being used by drivers, the U467 is also frequented by walkers, cyclists and horse riders. There are no pavements on any part of the road, and the verges are uneven; nor is there any street lighting

The concerns around the proposed usage of the U467 are therefore that :

- * it is generally unsuitable for regular heavy traffic
- * its existing junction with the B961 is dangerous
- * it will conflict with existing motor traffic
- * it will be dangerous for non - motor users
- * it will be noisy and potentially dangerous for the occupants of the two dwellings right by the proposed entrance

The Scots National Roads Development Guide (1) for which Angus Council members formed part of the steering group, states that "The frequency with which they use each road should be considered and the road should be designed to match the need. High frequency use of HGV service vehicles will require that the road width is suitable to accommodate these vehicles **traveling in both directions** and the width should ensure that they can pass each other safely and at the appropriate speed"

It should be borne in mind that other large vehicles use the U467 from time to time, for refuse collection, delivery, and agricultural vehicles used by farmers and contractors from outwith the area, for working on leased fields. There may also be conflicts with emergency vehicles



The above photograph shows a harvester seen recently on the U467, and damage to the carriageway edges can be seen on the left of the photograph. The width of the road is the same all the way to its junction with the B961

Although not yet clear, our expectation is that the HGVs servicing the site will either be multi - axles or articulated, and these will of course predominate in the construction phase of the site's development, and be particularly troublesome

In its document 'Technical Measures Document (deals with) design codes relating to roadways ...' (2) the Health and Safety Executive says that "All two - way industrial roads should have a minimum width of 7.3 metres. Curves should be of sufficiently large radius to permit HGVs to pass without the need for local widening. Only where this is not reasonably practicable should local widening be provided to cater for the swept path of HGV vehicles

The current width of the U467 therefore falls well below the minimum recommended by the HSE, but the document does refer to the possibility for 'local widening', which then begs the question of where would this local widening take place

For approximately 577 metres south of the proposed entrance to the development site the U467 is bounded by verges and dry stone dykes on both sides, except where the applicant has already destroyed a length of it, right by the proposed entrance, in seeming anticipation of planning permission being granted

The verges are both overgrown and steep, varying between one and three metres wide. The one on the west side conceals a culvert containing cables for much of its length

The drystone dykes are a prominent feature of the landscape here, and have probably been in place for a few hundred years or more, particularly the one to the west which is overgrown in many places and almost certainly forms a valuable habitat and wildlife corridor for small vertebrate wildlife, and insects. The plant life is also important here, as further north on the same road there are several patches of orchids. Deeper investigation would no doubt uncover other species (of flora and fauna) of interest and, as an aside, we are also keen to ensure that any environmental assessment of the development proposal also includes all areas which are going to be affected in some way, including the roads.

We believe that retaining the existing dry stone dykes is important to the biodiversity of the area, which is already dominated by intensive agriculture. This subject is well outlined in Farm Wildlife (3). The desirability of retaining dry stone dykes is further acknowledged by Historic Environment Scotland (4)

The applicant has already mentioned an intention to include passing places on the U467, although this was not mentioned in the scoping document submitted by the applicant's agent.

The document referred to in (1) below also states "Where a development is proposed on a road which does not meet these criteria then the developer will be required to widen the road along the frontage of the development or the access road to the development to the appropriate width and provide new and/or passing places where required to mitigate the development traffic. Note this requires statutory consents such as a Section 56 Roads (Scotland) Act 1984"

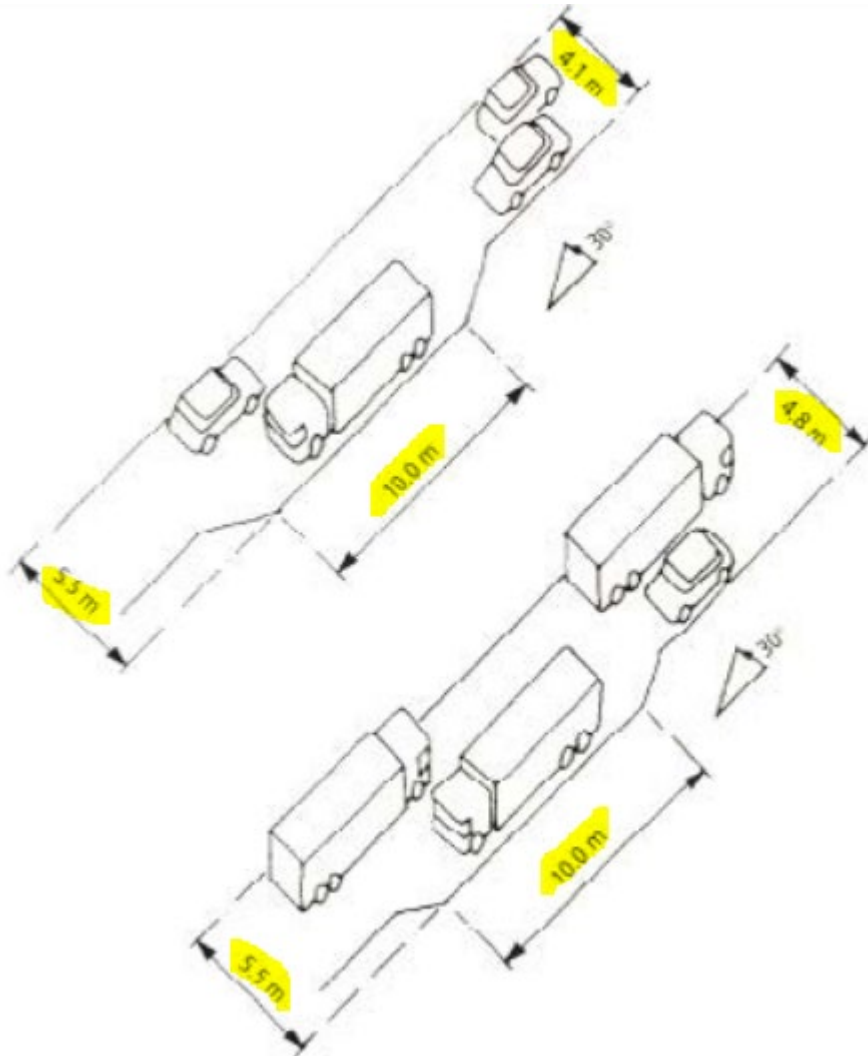
Should any such road work go ahead, we would seek reassurance that the developer, and not the council, would be responsible for paying for this

The same document goes on to say "On an existing narrow rural road, passing places should be constructed to enable user defined traffic to pass. The design of such a passing place should consider functionality against a balanced view of place - making aspirations and a presumption against urbanising the countryside.

All passing places should provide a minimum overall width of 5.5 metres. Locating passing places is dependent on gaining the maximum benefit balanced with planning legislation. Where possible, it is advisable to have intervisible passing places, adjacent passing places should be placed on alternate sides of the road or on corners where maximum benefit is gained. Locating passing places on bends on existing roads is advisable to assist vehicle conflict where reversing or anticipating and negotiating passing vehicles is more difficult"

Any passing places would have to be cut from the verge and dyke on whichever side of the road was chosen, and our view is that based on the above, and because of the sight lines, at least two would be needed, probably three over the 577 metres south from the site entrance.

The recommended size (1) of the passing places is as shown below



The implication is that if three passing places are built, and they adhere to the recommended sizes as above, another 50 metres or so of verge and dry stone dyke will be lost, and the unique character of this old country road will change forever.

The final point in this section asks if the U467 in its present form is actually up to the job of regularly carrying heavy goods vehicles, and none more so than during the construction phase

At face value, the road appears in decent condition, although the edges are not kerbed, making damage - crumbling of the edges - a probability. This can already be seen outside Summerhill and further north, where potato harvesters have recently damaged the edges of the tarmac.

At the junction with the B961, and just before the small splay at the junction, the carriageway of the U467 is still only five metres wide at best, with verges on either side

In addition to the junction being close to other hazards, a tight bend and a brow in the B961, the exit from the U467 has only a small splay, which means that to enter or exit the U467, heavy vehicles have to be on the southbound side of the B961, whichever direction they are coming from or going to

There is already signage in place to indicate a bend, and an Armco barrier with chevrons suggests that the council has at some time thought this a dangerous bend

To create a safe junction here would, in our opinion, require new signage, and the creation of suitable splays. The latter may possibly result in some loss to the cottage gardens in the northwest corner of the junction. The image below shows the situation:



Also present at the junction are two power poles, which would probably need to be moved

If the development is to go ahead in the location proposed, and we argue strongly that it should not, then there are more suitable approaches to the sheds as summarised in the image below

Red - the U467

Blue - the B961

Green - alternatives which run for the most part along existing farm tracks, and the part of the green line running 'south to north' will take up only marginally more farm land than the proposed access point by Summerhill House

Although technically possible, the green routes may be unacceptable to the applicant, as the final northbound 'leg' would presumably cross part of the range and put the birds at risk of physical harm from the vehicles servicing the site. There may also a need to keep traffic off the range to create a quarantine, to avoid disease transmission from farm to farm. That said, as the sheds are proposed to be positioned within the free range area, an access route crossing the free range seems unavoidable.



- 1)
<http://www.scotsnet.org.uk/documents/national-roads-development-guide.pdf>
- 2)
<https://www.hse.gov.uk/comah/sragtech/techmeastraffic.htm#:~:text=All%20two%2D way%20industrial%20roads,swept%20path%20of%20HGV%20vehicles.>
- 3)
<https://farmwildlife.info/how-to-do-it-5/field-boundaries/dry-stone-walls/#:~:text=Dry%20stone%20walls%20provide%20bare,as%20lichens%2C%20liverworts%20and%20mosses.&text=The%20linear%20nature%20of%20walls,features%20for%20birds%20and%20bats.>

4.

<https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationid=691877c6-bed8-4803-bdd1-a59500bb2828>

If the development is to go ahead with the sheds in the proposed position, then from an access point of view it would make more sense if the sheds were rotated through 180 degrees, so that the main service entrance faces east north east.

In addition to this maintaining the orientation preferred for natural aeration of the sheds, this would enable direct access from the B962 by extending the track past the applicant's wind turbine, as shown below.

Yellow - area of the development free range

Black - approximate position of the sheds

Blue - B962

Green - route to eastern end of sheds



The specific and serious reservations we have with the U467 being used as an access road for the proposed development, leads on to the choice of the location for the development site itself, which is unsuitable for a number of reasons

As we have said elsewhere, we understand and appreciate the applicant's wish to develop his business, but we sincerely believe the proposed location to be wrong

Looking at the development proposals from the perspective of access alone, there are far better options for access to and from the largest road in the area, the B961, if the hen sheds were simply to be located elsewhere.

There are two options, one being near to the wind turbine already in place on the applicant's land, just off the B961, and the other near to the existing collection of large farm buildings at North Mains of Cononsyth. Although the latter are not shown on the plans accompanying the scoping document as being part of the Cononsyth Farms Ltd demise, the land (and presumably the buildings) form part of the extended business operations of the applicant and his family

Road access to either of the potential locations appears remarkably simple, being directly off a long straight stretch of the B961, with excellent sight lines and only minimal work needed to enlarge splays and possibly install a few additional signs, advising of a farm entrance

The potential location could be to either the north or south of either access point, and, frankly, anywhere within the area outlined in the diagram below





Please refer to the image immediately above with reference to the text and images below



At A looking towards B
Opening on the left is the access way created by the applicant, destroying ca. 50 metres of old dry stone dyke
Width of the road is ca. one car and a half
There is a culvert all the way up on the right



B looking to C
Verges slightly narrower
Dry stone dyke on both sides, heavily overgrown on the right



C to D
Dry stone dyke continues on the right
Redundant semi - derelict farm buildings on the left



D to E

Semi - derelict farm buildings on the left

Red X shows position of existing entrance to applicant's land



Existing opening onto applicant's land at X in the image above

All the buildings in this image are semi - derelict

There is sufficient splay here for articulated lorries to enter and exit



As above



A above, from between D and E



Second existing entrance to applicant's land between D and E, looking towards bend at E



Second existing entrance to applicant's land at Mains of Cononsyth
Viewed from near E



E looking towards junction with B961 at G
Red dot marks the position of the junction



G looking to F
At junction with B961, front wheels on the give way lines, looking south on the B961



G to H

At junction with B961, front wheels on the give way lines, looking north east on the B961

Red arrow and dot indicates where a car recently hit the wall



F to G

Approximately 100M to the junction, which is not visible over a crest

Speed limit 60 mph



Between F and G, looking to G, having crested the rise referred to above
Large vehicles have to enter the right lane to both enter and exit the U467
Resident's gardens are immediately behind the Armco barrier and dry stone wall



From H, looking to I, J, K and L
The road ruins perfectly straight past all, with no crests or dips



Entrance to applicant's land at I
Gates are historically scheduled, so moving or changing them is unlikely



Looking north east up B961 from access to applicant's land at I
Excellent sightlines



Just south of the opening onto the applicant's land at J
Opening is on the left, where the dyke ends



Entrance to applicant's land at J, looking north east up B961
Easy access for large vehicles, and excellent sightlines



Another view of the opening at J



Entrance to the applicant's land at North Mains of Cononsyth off the B961, at K
Entrance is on the left, by the red dot
Road still dead straight



Another view of the entrance to North Mains of Cononsyth at K



Entrance to North Mains of Cononsyth at K



Applicant's buildings at North Mains of Cononsyth, from L



Looking south on B961 to entrance at K, from between K and L



Just south of I, looking to H



At H, looking at Junction with U 467 at G
Red dot indicates the give way lines



Looking from G to E

White gate to the right indicates the vehicle access point for some of the residents in the cottages on the crown of the bend on the B961. Direct 'conflict' with HGVs is likely for these residents, compounded by the close proximity to the junction.



Looking from E to D

The two red dots indicate the existing entrances to the applicant's land at Mains of Cononsyth



Looking from D to C



Looking from C to B



Looking from B to A

Red dot indicates the proposed entrance to the development

Water

Wells and groundwater, local knowledge

This section is intended to raise awareness of some of the likely drainage systems on and around the land proposed for the development, and to highlight what the residents regard as significant potential risks.

Please refer to both the photographs and the Google Earth images in this document, and the larger Google Earth image for a full appreciation of where these places are.

Notes begin on the following page



The red dot on the image(s) to the left show the location of the well, and the grey shading is the approximate area of the sheds

Although this is not a 'working well', the water within is fresh and clear, and completely different to the water in the Denton Burn, which is just a couple of metres away.

The well is possibly part of a different aquifer to that beneath the rising ground to the south towards Cononsyth, although its position right at the lowest point of that slope is significant, putting the water quality at risk

The well is about two metres north of the Denton Burn, which is at the foot of the long slope down from the development area

South Park, active well



This is a well maintained and functioning well, used regularly by the resident for watering vegetables and amusing grandchildren, who regularly play and bathe in the water

The pump, cylinder and piston are original items, having been restored by the resident's father 40 + years ago

Mid Park of Gardyne, land around, non - existant well, water activity



Top image: shows the apparent location of an old well, which was not found during field walking. The cottage at Mid Park is the house at '10 o'clock' from the well location



Middle image: the yellow highlight shows the approximate position of the well, and the red arrow the position of the cottage Mid Park. The ditch running from the foreground toward Mid Park is at the base of the field below that intended for the free range, and is owned and operated by another farmer.



Bottom image: the ditch contains a lot of water, which does not show clearly in the image. The ditch is fed by several small culverts, some apparently very old, and stone – built, which are draining the field uphill to the south. Denton Burn is to the left of the track by about 20 metres



Top image: one of several culverts draining into the above mentioned ditch. Water is apparently very clean and clear, containing several aquatic plants, and no algae



Middle image: Mid Park of Gardyne Cottage, showing to the north and west areas of yellowed crops, being damaged by excessive water, draining down the slope from the right of the image. Area immediately south of the cottage is an extensive area of marsh, containing rushes and other plant life adapted for those conditions. Wet conditions caused by surface run off, and upwelling from beneath



Bottom image: west of Mid Park, crops to the south of the track also showing yellowed areas caused by excess water, which is coming directly from the ground, and is not surface runoff

The images here suggest that there is an active body of water beneath the field immediately south of Mid Park, which is in turn the next field downhill from the proposed free range. It seems reasonable to assume that surface pollutants from the free range will make their way into this field, as well as leachates beneath the surface.



Track between Mid Park and South Park. Shows waterlogging at the uphill field margin on the left, which increases significantly in wet weather. Residents report that water hardly ever crosses the track but sinks beneath it, emerging as springs near the Denton Burn, shown as the blue line on the right

Smithyton, two wells, one active, one not found



The red dot shows the location of a well in the 1800s, which could not be found by field walking.

The yellow dot shows the approximate position of an active well which is the sole source of water for residents at Smithyton, dead north of the well, and at Summerhill Cottage ENE of the well.

Both dwellings are not connected to mains water.

The proposed development area is just over 600 metres to the area proposed for the sheds, and closer still to some parts of the free range. We believe there is a significant risk to the health of the residents in these two places, as it is very likely they lie over the same aquifer.

Summerhill House, active well



Although not original, the well pump works perfectly, and is used by the occupant for watering the garden plants and providing water for their hens. Water quality appears to be very good

Summerhill Cottage, extinct well and an odd water feature



Upper image: not much to see here, but the old well has been buried by the owner, for safety, and all that shows now is a mound of earth, covered by vegetation.

The red cross indicates the U467 where it passes between Summerhill House and Summerhill Cottage



Lower image: unusual water feature in one of the very old outbuildings at Summerhill Cottage. Whilst we can only speculate what its use was, the fact remains that the water within is clean and fresh, and during periods of heavier rain acts as a spring, with water running out of the building



Upper image: odd and active water feature in outbuilding at Summerhill Cottage

Lower image:

Red dot, active well, Summerhill House

Yellow dot: active odd water feature, Summerhill Cottage

Green dot: buried well, Summerhill Cottage

These wells / water features seem to align with the active well at Smithyton, and several of the water features on the land proposed for development. This is surely more than a coincidence, and suggests a continuous water feature, such as spring line, emerging from an aquifer common to each. If this is correct, then the quality of the water is jeopardised by the development, putting at risk those who ingest it or use it.

Land to be occupied by the development, water features



Top image: large well / cistern, deep, stone lined and with clear water running through. This feature is associated with the same line of features that start to the west with the well at Smithyton



Middle image: location of the above, at the corner of the wood



Lower image: location of the well

As will be seen from the following images, this line of water features continues to the east north east, towards Fairfield Mains, the name for which in the 1800's was simply Ditch ... which perhaps tells us something about the direction of water movement in modern times.



Top image: pipes, presumably some sort of water management / irrigation system installed by the applicant; source and destination of water unknown



Middle image: showing the positions of, in red, the large active well / cistern, in yellow, the above water pipes, and in green another large square cistern, but this one is redundant, with overgrown sides and a large boulder in the bottom, presumably to cover a hole



Lower image: relative positions of the three features referred to above



Top image: large body of standing water in the destroyed wood to the east of Summerhill. It is unclear if this is surface runoff or water emerging from beneath. It is close and slightly downhill to the active cistern / well referred to above



Ditch at the bottom of the field destined to become the northern free range area. Surface water has clearly run down the field edge into this ditch, which was described by the person who took the photograph as 'frothing' because of the rate of flow, as can be seen at bottom left. The row of trees at the top of the image is the north edge of the destroyed wood

The above images clearly show how uncontrolled surface water can make its way via field edges and unremarkable ditches into a body of water which is perhaps more important. This ditch is at the top of the field to the south of Mid Park, and presumably its contents make their way to the bottom of that field, and thence into the Denton Burn



Dots:
 yellow, large active well / cistern
 blue, approximate area of flooding in the wood
 green, location of photograph on previous page
 red, Mid Park cottage

Turquoise line, Denton Burn

The land slopes downhill all the way from the wood to the Denton Burn, and it doesn't take too much imagination to see how pollution could easily occur

Fairfield Mains and Blackhillock



Upper image, probable location of old well at Fairfield Mains; a large square depression at the end of a ditch, now overgrown



Lower image, looking 90 degrees anticlockwise (north) from the above image, showing a large area of standing water in the crops, and (shown by the green arrow) a straight line row of trees, which are pretty much down the fall line of the land from the now redundant well. This suggests a water course below ground which is still active, and supporting the trees



The top two images show the remains of the well at Blackhillock, which looks as though it has been buried and filled in some time ago. That said, the presence of standing water, and the very boggy surrounds of the well itself shows that this spot is still providing a drainage point for surface water, and possibly underground as well.

Earth image, drawing together the feature at Fairfield Mains and Blackhillock.

Red dot, buried well at Blackhillock, blue dot, abandoned well at Fairfield Mains, blue circle, standing water in field crops, green lines, four trees, which are down the fall line from the abandoned well

Although the features at Fairfield Mains and Blackhillock are now abandoned and difficult to see, what is clear is that their presence definitely indicates that there is still an active water environment in the area, which almost certainly drains to the north, toward the top of the above image.

North Mains of Cononsyth, pond and associated features



Top image, a general view of the pond at North Mains of Cononsyth, looking from its north east corner towards Blackhillock.

During the consultation phase, this pond was mooted as being the receiver of the surface water from the sheds and hardstanding.

The situation appears now to have changed, and the current role proposed for the pond is uncertain

Centre image, the pond discharges into a ditch immediately to the north, and this ditch in turn makes its way eastwards past Muirhouse, some distance from the pond, and presumably into a river, which we have not yet traced.

The reason for mentioning this is that it exemplifies how water courses which are not mapped can have significant bearing on how easily potential pollutants can be distributed across the land

Lower image, the same ditch, running west south west towards Blackhillock, where there is of course a redundant well



A summary plan, showing most of the places and features referred to above:

- A: Queenswood Cottage
- B: Denton Burn
- C: South Park
- D: Mid Park of Gardyne
- E: Ditch, showing direction of flow
- F: Marked position of well; not found
- G: Ditch, direction of flow
- H: Drainage point into G ditch, from land above
- I: Marked position of well; not found
- J: Smithyton farm
- K: Well, service Smithyton and Summerhill Cottage
- L: Summerhill Cottage
- M: Summerhill House
- N: Standing water in wood, approximate position
- O: Active cistern / well
- P: Applicant's water management pipes
- Q: Redundant cistern / well
- R: Large body of standing water, Fairfield Mains
- S: Row of trees
- T: Redundant well, Fairfield Mains
- U: Redundant well, Blackhillock
- V: Pond, North Mains of Cononsyth
- W: Ditch, carrying outfall from pond, showing direction

The above will hopefully demonstrate that firstly there is considerable water activity over, around and under the proposed development site

This activity links all the dwellings and associated areas throughout and around the development area, and in so doing highlights the potential risks to health and the environment posed by this development

The residents against this development hope that this alone will lead to the application being refused or, at the very least, will result in a very full and extensive re - examination of the application, with a view to fully understanding the hydrology of the area. We are seeking complete reassurance for those potentially affected by the development if it goes ahead, and a clear acknowledgement of accountability by named individuals should something go wrong, rather than hand - wringing and failure to take responsibility after the fact.

Ruari Kelly

From: John Bell [REDACTED]
Sent: 24 September 2021 13:40
To: Ruari Kelly
Subject: Planning application 21/00337/FULM, North Mains of Cononsyth
Attachments: Response to Cogeo commentary on objections.pdf

Good afternoon Mr Kelly,

Please refer to the attached document, which I have put together in response to Cogeo's comments on the objections received to this application

After having read their document, I found myself left with the feeling I could not let it go unanswered

I've used Cogeo's original document, with their content unaltered in any way, and added my comments in red font

I'd be grateful if you would consider this, and add the attachment to the documents already associated with 21/00337/FULM on the Angus Council web site

Thanks, and regards,

John Bell,
East Mains of Dumbarrow Cottage,
DD8 2SR

MR RUARI KELLY,
ANGUS HOUSE,
ORCHARDBANK BUSINESS PARK,
FORFAR,
DD8 1AN

20/09/2021

21/00337/FULM – North Mains of Cononsyth Farm

Following the submission of planning application 21/00337/FULM, Cogeo Planning and Environmental Services Ltd. have had the opportunity to consider the objections received in relation to the above planning application and have set out our response to each heading of objection below.

Although I assume Cogeo are within their rights to comment on the objections raised, I do find it odd that they feel it necessary to do so. The application process should presumably be straightforward, in that the applicant and his agent present their best possible case for the development, those objecting to the same, leaving the council to make a decision. Attempts by the applicant and his agent to undermine and belittle valid objections seem at odds with the process.

While many objections were lodged via Angus Council's planning portal, there were several that were sent directly to Angus Council's Planning Officer due to the level of detail within the objections. All objections have been acknowledged and having reviewed the content of each, it is confirmed that the assessments carried out by all consultants are a true and accurate representation of the potential impacts.

This is opinion being presented as fact; the assessments carried out by consultants are true and accurate in their opinion, but that does not make the opinions of the objectors any less valid, particularly bearing in mind that many of the objections and comments come from people who have lived close by for many years, and are very familiar with how things are on and around the site of the proposed development

The information detailed within the application presents an in-depth and transparent assessment of potential impacts related to the proposed development on land at North Mains of Cononsyth Farm. The assessments conclude that the impacts associated with the development will be minor and where necessary, mitigation measures have been considered to further alleviate impacts.

This is more opinion, and is really for Angus Council to decide rather than for Cogeo to repeat what they have already broadly stated that any potential impacts are negligible, and can easily be mitigated, which is far from correct



Objection: Management of hen litter from the poultry shed and spreading of fertiliser on land

Response: Whilst not a planning consideration, it should be made clear that the use of hen litter as fertiliser is already carried out on Cononsyth Farm. Cononsyth Farms Ltd implement an odour management plan with the current fertilisation regime that will be continued with the new hen sheds and detailed within the IPPC Permit application to SEPA and is therefore an ongoing concern for SEPA as part of the hen shed operation.

It may be that Cononsyth Farms already use hen litter as fertiliser, but to my knowledge none of the immediate neighbours have ever been consulted as part of the 'odour management plan', and they should surely have some input, as they are most likely to be affected. At the very least the use of this noxious material should be subject to risk assessments and method statements which jointly will provide a Safe System of Work which can be viewed by all stakeholders, including residents. Secondly, the volume of litter which will be produced by 64000 hens far exceeds the amount which can be spread on the applicant's land

The hen litter produced within the hen sheds will be collected via conveyer belts and dried prior to collection, reducing its weight, volume and odour. Once dried, it will be collected by and stored offsite. Hen litter within the range area directly from hens will be approximately 5%. This is a net decrease from the amount of fertiliser currently used on the site for cereal production.

Where is this litter to be dried? 64000 hens are going to produce around 9 tonnes of droppings per day, and assuming that 50% of this is on the range area, that still leaves 4.5 tonnes to be collected and dried in the manner described. This equates to around 1600 tonnes of this material being dried every year. Interesting to note that Cononsyth Farms application 21/00550/FULL is for a biomass operation, ostensibly to dry chipped wood for use as fuel. This plant could presumably be used to dry hen droppings, in which case this needs to be reviewed as such by Angus Council

Objection: Concerns regarding pollution to the Angus countryside

Response: All air quality pollution associated with this development is regulated by SEPA through the IPPC Permit, following approval of the permit application SEPA will continue to regulate the hen sheds throughout the lifetime of the development. It is in the interest of both the Applicant and the regulatory authority to ensure the safe operation of the development in order to limit the pollutants generated from its operation. Following review of the Air Quality Impact Assessment, SEPA provided comment on the application confirming that they had no objections.

The above provides little reassurance to those who are likely to be affected by pollution, and clarity is sought as to what regulation will take place should the development proceed. In other words, what routine monitoring will be established, how often will routine measuring take place, and what action will be taken if monitoring finds that 'acceptable' levels are being exceeded



Objection: Operational noise concerns

Response: A full noise assessment has been undertaken in line with BS4142 and BS8233 as requested by Angus Council within the Scoping Opinion.

It was concluded that the assessment demonstrates the proposal would not give rise to significant adverse noise impacts, which is the test under PAN 1/2011, or exceed the levels of noise as required by Angus Council.

As with pollution, there is no reassurance that the performance of the development will be routinely monitored. This is a major development in an otherwise quiet and tranquil rural area, and it is not unreasonable to ask how often routine measuring will take place, and what action will be taken if monitoring finds that acceptable levels are being exceeded

Objection: Concerns regarding the water run-off from field increasing surface water flooding at nearby residential dwellings

Response: A full flood risk and drainage impact assessment has been completed which accounts for fluvial, surface water, coastal and groundwater flooding. Appropriate mitigation measures have been proposed to ensure that the development does not increase the flood risk. Appropriate drainage measures have been designed into the development in line with SuDS requirements.

The Flood Risk and Structures team at Angus Council have no objections in terms of the flood risk and drainage.

None of the above aligns in any way with local knowledge and opinion, coming from people who have lived nearby for decades and have an intimate knowledge of the landscape and how water behaves on and around the site. It is the collective opinion of those people that there is a significant risk of water pollution, and that cannot be disregarded, no matter what Cogeo say has been taken into account.



Objection: Location of the development close to residential properties – not considering brownfield sites and sites near existing farm buildings

Response: As detailed within Chapter 4 of the EIA Report, there are a several factors that have been considered when deciding the location for a development of this scale. While many objections were received regarding the location of the development within 400m of residential properties, detailed technical assessments have ensured that the development remains compliant with all legislation. All land within the Applicants ownership was considered for development; however, given the industry free-range requirement for the hens to have access to 40Ha of range area, there was no other site within the land holding to accommodate the proposal and comply with the operational requirements.

This is misleading, as there are other areas on the applicant's land where the range could be situated, two of which are closer to the applicant's dwelling and with much better access. Also, there has been no public view of the considerations made for alternative sites both at Cononsyth and elsewhere, and the reasons for their rejection. From this it seems as though we are being asked to simply take the applicant's word as proof that such considerations have been made



Objection: Loss of Prime agricultural land

Response: Following the Scoping Opinion received from Angus Council (20/00694/EIASCO), it was deemed that further surveys in relation to the loss of the agricultural land could be scoped out of the EIA Report. However, the loss of agricultural land has been assessed within the Planning Statement in relation to Policy PV20 of the Angus Local Development Plan where it considered to meet the criteria of the policy.

Objection: Visual impact of hen sheds within a rural location

Response: A full Landscape and Visual Impact Assessment was completed for this development to determine the potential visual impacts within the local area. The photomontages submitted alongside the EIA Report confirm that the hen sheds will be of an acceptable scale and do not cause an unacceptable visual impact. There have been no objections received from Angus Council Consultees regarding the visual impact of the development therefore we are confident that our in-depth assessment has alleviated all concerns and confirm that this development is appropriate in terms of its scale and appearance.

The landscape assessments and photomontages are misleading. Images have been taken from the most favourable viewpoints, using methods which seem to be different from those employed by other local authorities. The visual impact needs to be viewed not just in terms of the buildings themselves but also the considerable surrounding arable land take of 46 hectares for the forage areas involved in this proposal. Forage areas may initially sound benign, but in a few years they are stripped of vegetation and become unattractive bare earth. The proposed tree planting will take many years to provide any minimal screening and will be subject to a high level of failure. Finally, the applicant has proposed a bank of solar panels for the south facing slope of the shed roofs, which will further add to the visual impact



Objection: The development will have an overall negative impact on the quality of life of the locals and impact their amenity

Response: Extensive assessments have been carried out to determine the potential impacts arising from the installation of the free-range hen sheds at North Mains of Cononsyth Farm, all of which conclude that there will be no significant adverse impacts on the area surrounding the development therefore resultant impact to the locals will not exceed allowable limits.

This bland statement typifies the agent's responses to other issues, as, 'we've looked at the objections, and believe that everything will be fine'. It is incomprehensible how it can be concluded that the imposition of a 64000 hen intensive poultry unit, with all its associated buildings, plant and access, plus 80 acres of fenced free – range and proposed changes to the roads into an otherwise rural landscape will have 'no significant adverse impact'.

Objection: Concerns about the access route and increase in transport within the local area

Response: The chosen access route was deemed most suitable following an in-depth assessment of the site.

Through the adoption of mitigation measures, agreed with Angus Council, including the formation of passing places on the U467, continued maintenance of the visibility splays and the development of the CTMP, there will be no unacceptable or significant adverse impacts on the local road network as a result of this development.

The 'in depth assessment' did not involve contact with any of the people who regularly use the U467, and the traffic census was carried out at a time of year when its findings were skewed by the weather / season, and by lockdown. The mitigation proposals really need to be assessed on conjunction with residents, who have been 'scoped out' of this conversation altogether. Further assessment should also consider the irreversible damage which will be done to the dry stone dykes on both sides of the U467, the impact that will have on the flora and fauna they support and how their removal will detract from the landscape

It is difficult to see how a very narrow, bendy country lane with poor sightlines, can be thought of as a more suitable access route when compared to the dead straight two lane carriageway of the B961, off which there are ready – made access points to the applicant's land



Objection: Too many Poultry developments in Scotland, why not use existing hen sheds not in use

Response: Given both the environmental and financial constraints associated with farming, it is imperative that rural farming businesses incorporate modern farming techniques. Regarding any derelict hen shed buildings there are several reasons why it may not be possible to utilise these existing buildings:

- Due to the operational requirements of free-range hen sheds, a member of staff is required to be within close proximity to the site at all times.
- As will be the case if the development goes ahead as planned at Cononsyth, so there's no point to be made here. There is no need for a member of staff to be based at Cononsyth if the development was to be elsewhere
- The land must be within the Applicants ownership.
- It is not clear why this must be so; could not the land be rented?
- It is possible that the buildings would not be fit for purpose given the strict regulations and high standards that are required to operate and manage a modern free-range hen shed.
- Whilst it is possible, it is not impossible either, and bringing an existing hen shed up to standard would, I imagine, be less costly, and less damaging to the environment, than building a new one from scratch
-

Objection: Impact to the local wildlife and felling of woodland

Response: A full Phase 1 Habitat Survey was completed in line with the comments received from Angus Council within the Scoping Opinion and it was concluded that the development site was not of significant wildlife value, nor did it provide suitable habitat for protected species.

A tree survey was also carried out following the recommendation from Angus Council, this concluded that the formation of the access track would not have any impact on boundary edge plantation trees. The woodland has been felled under license, this was applied for in 2015 and granted in 2016, and is not related to the development proposed.

The habitat survey was undertaken at a time of year when many species were dormant or absent ... at least difficult to verify their presence. This is particularly important in the case of the dry stone dykes which will be damaged if the proposed changes to the U467 are made

The woodland mentioned above used to contain a varied wildlife, including red squirrels and bats, but was largely felled by the applicant who destroyed, unnecessarily, a large section of dry stone dyke to gain access. If that woodland had still been in place then this would have represented a significant barrier to the development proceeding. Also, there are readily available images on Google, date stamped at June 2018 which show the wood in its original state.

Many people would therefore conclude that the destruction of the woodland was directly related to the application subsequently being made



Objection: Concerns about animal welfare

Response: It is on the interest of the Applicant to ensure that the welfare of the birds are maintained throughout the operational lifetime of the shed, this will be overseen by DEFRA who monitor and regulate the welfare of animals. This is a free-range hen shed therefore they will have access to 40Ha of range area with tree planting

It should be assumed that the highest standards of animal welfare would be aspired to, however to aid understanding and to allay concerns it would be helpful to have clear documented evidence attached to this application, detailing how frequent the routine inspections will be, to what standard(s) and what the penalties are for transgression

Objection: Method of public consultation

Response: Following the submission of a Proposal of Application Notice (PAN) to Angus Council (ref: 20/00811/PAN) it was deemed that the proposed consultation method met the criteria of the temporary guidance set out in The Town and Country Planning (Miscellaneous Temporary Modifications) (Coronavirus) Regulations 2020.

The consultation event conducted complies with the temporary substitute for a face-to-face event as specified in paragraphs 18 – 20 of the Coronavirus (COVID-19): planning guidance on pre-application consultations for public events.

There are a number of people who are of the opinion that although the 'public' consultation event apparently complies with current requirements, it is unconstitutional and contrary to the requirements of freedom of information in the public domain, this being to the benefit of the applicant and his agent. These concerns are being actively pursued with the Information Commissioner's Office.



We acknowledge the following detailed objections received from members of the local community:

Mike Rushforth 09/06/2021, 07/07/2021, 01/08/21 and 15/09/2021

Jake Stewart 11/06/2021 and 23/06/2021

Susan Burness 31/05/2021

Valerie McMillan 01/06/2021

Graeme Mclean 04/06/2021

John and Alison Skilton 04/06/2021 and 10/06/2021.

Lesley Durham 09/06/2021

Ian Grant 06/06/2021

David Liddell 11/06/2021

Phyllis Jolly 14/06/2021

Simon Milne 14/06/2021

Anni Whitehead 11/06/2021

There are other local objectors whose names do not appear here, mine amongst them

The comments received do not bring to light any further information and are not based on professional assessment. All assessments carried out for this development meet relevant regulations and guidance, providing a transparent assessment of the development proposed and the potential impacts that could arise.



John Bell
East Mains of Dumbarrow Cottage,
DD8 2SR

11th October 2021

Ruari Kelly,
Planning Office (Development Standards),
Angus Council.
KellyR@angus.gov.uk

Dear Mr Kelly,

Cononsyth Farms Ltd, planning application 21/00337/FULM

Commentary on visualisations submitted by the agent, Cogeo, on behalf of the above applicant

The visualisations and text I'm referring to is in the Environmental Impact Assessment, section 7.3.4 *et seq.*

Closer scrutiny of these sections has revealed a number of issues which need to be noted and discussed in due course.

Rather than send to you a large document, I preferred to summarise my thoughts in a simple letter.

As part of my scrutiny I have seen the Technical Assessment of the visualisations submitted for the Easter Meathie application, also from COGEO, application 21/00602/FULM

Although my neighbours and I are not professionals on this subject, it has occurred to us that many of the shortcomings highlighted in that document also apply to the visualisations in the Cononsyth application.

I'm sure that you are already fully aware of this issue but hope, even at this late stage, you will take full account of the questionable quality of representation of the visualisations when assessing the visual impact that the development will have on nearby local residents and the wider landscape.

Aside from the quality of the visualisations already presented as part of the Cononsyth application, there are a couple of other problems.

The first is that the visualisation take account only of the buildings, and do not include the 80 acres of free range at all, along with its estimated 3.6Km of *boundary* fence, plus internal fencing.

Secondly, of the four sensitive receptors nearest to the site, Cogeo have not provided images from two of them, despite there being easy access to both.

I have considerable detail on these points, but for now I will leave it that and would be grateful if you would add this letter to the documents already on the Council's website

Yours sincerely,



Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

Customer Details

Name: Ms Kate Fox

Address: The Island House Minster Street Salisbury SP2 0BH

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:How sad that "objections associated with ethical principles and animal welfare unfortunately are not viewed as relevant by the Council."

Let me just remind you that it is this same inability to behave in an ethical way towards animals that has led to Covid-19 and the ensuing lockdowns that we have all had to suffer. What a shame that you are unable to connect those dots.

Twenty years ago climate change was the reserve of the eccentric....The same will be true for animal rights in the near future.

With veganism growing at an impressive rate, your children will look back in horror that you were associated with such proposed developments.

Do not look back and feel embarrassed about your role in this world. It is time for you to take a stand and be a part of the future. One that your children and grandchildren and more importantly, you will be proud of. Hand on heart, do you feel proud of your role in this development?

From: [REDACTED]
To: PLANNING
Subject: 21/00337/FULM | Erection of two 32,000 capacity free-range hen sheds and associated infrastructure
Date: 28 June 2021 13:16:38

Dear Planning Committee,

I would like to object to the above application. My reasons are as follows:

1. Zoonosis and the risks to human health of keeping large numbers of birds in confined space.

Scientists have predicted that the next pandemic will start as an Avian Flu.
<https://www.cdc.gov/mmwr/volumes/66/wr/mm6635a2.htm>

Since November 2020 we have had 25 outbreaks of Avian Flu in the UK.
<https://www.gov.uk/guidance/avian-influenza-bird-flu>

Some of these have been outbreaks in Scotland itself :
[Avian influenza \(bird flu\): how to spot and report the disease - gov.scot \(www.gov.scot\)](http://www.gov.scot)

It should be of concern to all of us that the next pandemic may be just around the corner and many people fear that a factory farm could well become the cause with their overcrowding and unhygienic conditions. **An industrial chicken farm with 64,000 birds is an incredible risk.**

The World Health Organisation (WHO) has said "... authorities have a responsibility for controlling zoonoses – diseases transmissible from animals to humans through direct contact or through food, water and the environment. An estimated 75% of emerging pathogens are of zoonotic nature".

Scientists estimate "that more than 6 out of every 10 known infectious diseases in people can be spread from animals" (Centers for Disease Control and Prevention <https://www.cdc.gov/onehealth/basics/zoonotic-diseases.html>)

2. Antibiotics and the risk to human health

THE WHO states "Antibiotic resistance is one of the biggest threats to global health, food security, and development today." (<https://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance>)

The Soil Association says (www.soilassociation.org/reducing-antibiotics-in-farming/)

"Farm animals consume one-third of all antibiotics in the UK and it is intensive farming systems that use drugs at unnecessarily high levels, putting human health at risk."

"The routine use of antibiotics in intensive farming systems is driving this problem. Drugs are given to animals as a preventative measure - before they show signs of illness - to compensate for animals being housed in cramped, unsanitary conditions where infections spread fast. Intensively reared pigs and poultry account for 79 % of UK farming antibiotic use"

3. The environmental impact

There will be a significant impact on the local area with pollution from ammonia and nitrogen. The main pollutants, according to DEFRA 2007, are ammonia and N2O.

Nitrous oxide (N2O) has 296 times the Global Warming Potential of CO2 and ammonia (NH3), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH4, N2O and NH3, respectively (NAEI, 2007), nearly all of which is derived from livestock production."
<http://scienceresearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=14662>)

“Ammonia and nitrogen pollution, mostly from agriculture, is harming more than 60% of the UK’s land area and affecting the most sensitive habitats, according to a DEFRA report. Ammonia pollution also effects species composition through soil acidification, direct toxic damage to leaves and by altering the susceptibility of plants to frost, drought and pathogens. At its most serious, certain sensitive and iconic habitats may be lost” (<https://www.endsreport.com/article/1588258/ammonia-pollution-harming-60-uk-land-area>)

4. Local impact

Animal agriculture does not protect wildlife as this 2019 Defra report illustrates: (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834432/evidence-compendium-26sep19.pdf)

“Biodiversity - Farming practices can have many impacts that can lead to a reduction in wildlife biodiversity (including loss of habitats and food sources). The UK farmland bird index, an indicator of the state of wildlife generally, has fallen to less than half its 1970 value”.

According to Proceedings of the National Academy of Sciences - since humans became farmers, just 17% of wild mammal species remain (from mice to elephants).

As the site is relatively close to a number of residential properties this development can only have an increased negative effect on the local residents, in particular noise, odour, pollution and disease.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which could be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats.

5. Public opinion

85% of the public are against Factory Farms. Defra 2019 reported that a survey showed that 78% of people felt it was “very important” to protect the welfare of farmed animals and that 82% said farmers should be rewarded for offering animals higher welfare standards. With so much public opinion against such farms, it would not be right to approve planning against such majority feeling.

In case the title ‘free range’ is confusing, please note that there has already been a recent Animal Aid investigation into another unit where the group exposed some terrible conditions. Footage showed hens with extensive feather loss, injured birds and several dead and decomposing birds left among the living. Conditions were extremely dirty with heavy dust and faeces accumulating. A very small percentage of the birds were outside ‘ranging’ during the daytime, this may be attributed to crowding and social hierarchy which prevents birds accessing pop holes. Some hens may never range outside. <https://www.youtube.com/watch?v=O7Ish7cMOXA&list=UUQU-2dIbbNDhtW7rHr3RG2g>

Two sheds are proposed for the purpose of accommodating 32,000 laying hens each, totalling 64,000 hen capacity at the site. In light of this, we really must question whether the health and welfare of an even larger population of birds can possibly be effectively monitored generally or safeguarded in an emergency situation. And more widely question whether such huge scale, vertical farming with many thousands of hens, can really constitute ‘free-range’.

This is not free range as TV adverts may show with hens free to dust bathe and pick in the ground- please make no mistake this is a proposal for a large industrial Factory Farm

Please register my firm objection to this application.

Yours faithfully

Liz Carlton
Cm35fn

Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

Customer Details

Name: Ms Mairi Wallace

Address: 25 Osnaburg Street Forfar DD8 2AA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this application on the grounds that it will destroy valuable habitat for many native species of birds, mammals and insects.

I object to industrial buildings taking up valuable countryside and making agricultural land unusable for any other purpose in the future.

From: [REDACTED]
To: [PLANNING](#)
Subject: FAO Ruari Kelly. Case officer Angus council | Objection to: 21/00337/FULM | 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 lan...
Date: 21 June 2021 13:25:08

Objection to:
21/00337/FULM | 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 | Field 530M West Of North Mains Of Cononsyth Farm, Cononsyth, Arbroath.

Dear Mr Kelly and the Planning Committee.

I ask that a copy of this letter is made available to the whole Committee delegated the task of assessing this application.

Please accept my objection to the above planning application.

My reasons are as follows:

HUMAN HEALTH:

PANDEMICS

We are in the middle of a pandemic that is killing people. Scientists have predicted that the next pandemic will start as an Avian Flu. Since November 2020 we have had 25 outbreaks of Avian Flu in the UK. Some of these have been outbreaks in Scotland itself.

It is a massive risk to consider introducing an industrial chicken farm on such an enormous scale, **64000** birds, with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potential to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

ANTIBIOTIC RESISTANCE

THE WHO states "Antibiotic resistance is one of the biggest threats to global health, food security, and development today."

The WHO also state "Antibiotic resistance occurs naturally, but misuse of antibiotics in humans and animals is accelerating the process."

The Soil Association says (www.soilassociation.org/reducing-antibiotics-in-farming/)

"Farm animals consume one-third of all antibiotics in the UK and it is intensive farming systems that use drugs at unnecessarily high levels, putting human health at risk."

"The routine use of antibiotics in intensive farming systems is driving this problem. Drugs are given to animals as a preventative measure - before they show signs of illness - to compensate for animals being housed in cramped, unsanitary conditions where infections spread fast. Intensively reared pigs and poultry account for 79 % of UK farming antibiotic use"

ENVIRONMENTAL IMPACT

The short-term benefits of employment and meat production are outweighed by the environmental impact that it will have on the local area which is already facing a climate emergency. What we eat has a huge impact on the environment and has potential to cause disease and pandemics so applications should be considered in line with our broader responsibilities to protect future generations.

Furthermore, the Government sees Local Authorities as central to delivering its CO₂ emission targets yet more and more intensive farming applications are going through planning departments across the UK. It is important

to recognise the significant impact just one factory farm will have on the pollution and environment of the local area.

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

On the Angus Council Website there are various statements that the council has committed to which this type of development actively goes against, below are just a few excerpts:

We support the principle of sustainable development and are committed to improving the quality of life for present and future generations in Angus. By a process of integrating responses to environmental, social and economic issues the council will help to maximise human welfare while enhancing the environment in Angus.

We will seek to:

- <!--[if !supportLists]-->• <!--[endif]-->promote a sustainable approach to land and habitat management.*
- <!--[if !supportLists]-->• <!--[endif]-->protect and enhance local biodiversity.*
- <!--[if !supportLists]-->• <!--[endif]-->encourage a sustainable managed approach to public access to the natural environment.*

We will seek to:

- <!--[if !supportLists]-->• <!--[endif]-->reduce local pollution of air, land, water and to reduce the incidence of noise and light pollution.*

We will seek to:

- <!--[if !supportLists]-->• <!--[endif]-->conserve and enhance the historic and cultural heritage of Angus and the local characteristics of the towns and villages.*
- <!--[if !supportLists]-->• <!--[endif]-->encourage design in new or regeneration developments which will improve access for the disabled and create an environment free from the fear of crime.*
- <!--[if !supportLists]-->• <!--[endif]-->ensure that new developments are in line with sustainable development priorities in regard to location and design.*
- <!--[if !supportLists]-->• <!--[endif]-->conserve and promote a network of greenspace within the built environment which links to the surrounding countryside through a footpath network.*

The documented discussions from the Angus Council Development Standards Committee 15 Sept also mentions:

In this case the proposed development would involve the loss of prime agricultural land (Policy PV20); it would introduce a use that could generate odour and noise in proximity to existing residential uses (Policy DS4); it would have impacts on the landscape (Policy PV6) and it is located in an area where SEPA flood maps indicate there is a flood risk (Policy PV12 and 15).

As the site is relatively close to a number of residential properties this development can only have an increased negative effect on the local residents, in particular noise, odour, pollution and disease.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which could be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats.

ANIMAL SUFFERING

Another reason for my objection is that I do not feel this application for a factory farm represents current public opinion. In a recent survey 85% of the public were against Factory Farms.

In addition, Defra 2019 reported that a survey showed that 78% of people felt it was “very important” to protect the welfare of farmed animals and that 82% said farmers should be rewarded for offering animals higher welfare standards.

Although the current animal welfare laws in the UK are slim I feel it is morally wrong to subject sentient animals capable of fear and misery to overcrowding, unhygienic conditions, large scale antibiotic use, mutilations without anaesthetic and no chance of a normal life. Factory farms like these result in close

confinement aggression and arguably completely prevent any sense of normal behaviour as defined in the Animal Welfare Act 2006.

Whilst I appreciate that animal welfare is not a planning consideration, I would like to draw your attention to the recent Animal Aid investigation into another unit where the group exposed some terrible conditions. Footage showed hens with extensive feather loss, injured birds and several dead and decomposing birds left among the living. Conditions were extremely dirty with heavy dust and faeces accumulating. A very small percentage of the birds were outside 'ranging' during the daytime, this may be attributed to crowding and social hierarchy which prevents birds accessing pop holes. Some hens may never range outside.
<https://www.youtube.com/watch?v=O7ISh7cMOXA&list=UUQU-2dIbbNDhtW7rHr3RG2g>

Two sheds are proposed for the purpose of accommodating 32,000 laying hens each, totalling 64,000 hen capacity at the site. In light of this, we really must question whether the health and welfare of an even larger population of birds can possibly be effectively monitored generally or safeguarded in an emergency situation. And more widely question whether such huge scale, vertical farming with many thousands of hens, can really constitute 'free-range'.

Whilst sadly not a legal consideration it most certainly should be a moral one.

I OBJECT strongly to this application on the above grounds.

Yours faithfully

Maureen Hackett

Ruari Kelly

From: Mike Rushforth [REDACTED]
Sent: 07 July 2021 12:52
To: Ruari Kelly
Subject: SEPA Response to Application Reference: 21/00337/FULM).

Dear Mr. Kelly

The following email has been prepared by seventeen receptors living in the vicinity of the proposed development.

Comments regarding SEPA's response to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure at North Mains of Cononsyth (Application Reference: 21/00337/FULM).

We are concerned that SEPA's analysis shows the application to be deeply flawed.

The fact that the ranging area is inadequate for 64,000 hens to meet the 170Kg N/H requirement for a Nitrate Vulnerable Zone (NVZ) contradicts previous assurances from the Applicant that the amount of manure falling on the range area would be significantly lower than the levels of chicken manure that the farmer currently applies. This suggests that the Applicant has provided misinformation to complainants at earlier stages in this process.

Referring to the statement that "all PPC pig and poultry units built after 2017 must reflect the Best Available Techniques (BAT) as stipulated in the IRPP BRef", BAT 2 in this EU document states that certain techniques must be used, including:

Proper location of the plant and spatial arrangements of the activities in order to:

- *ensure adequate distances from sensitive receptors requiring protection;*
- *take into account prevailing climatic conditions (e.g. wind and precipitation);*
- *consider the potential future development capacity of the farm;*
- *prevent the contamination of water.*

As we have pointed out previously, we see no evidence that the Applicant has applied BAT in developing this proposal.

We are extremely concerned by SEPA's comments associated with the Air Quality Impact Assessment (AQIA) and that "there is little headroom to allow for uncertainty in the modelled value for PM₁₀ concentrations". What are the Confidence Limits on these calculations? Most of the receptors in the vicinity of the proposed site are either retired, or work from home, and therefore will have no respite from exposure to these elevated levels of pollutants.

It is concerning that the Applicant has failed to make clear exactly what standard is being reported against (7 times or 35 times per year?) in a study of this importance.

The PM₁₀ concentrations are particularly concerning to us as vulnerable receptors and we trust that the Council will request SEPA to study this modelling in very close detail.

We do not understand why no mention is made of an annual mean requirement of PM_{2.5} 10.0 ug/m³ as described in Table 2.1 of "Local air quality management: policy guidance - April 2016". Looking at local air quality data, it appears that the PM₁₀ concentration will contain between 40 and 80% of particles in the 2.5um range. This suggests that the development will fail to meet the PM_{2.5} requirement when background levels are taken into account.

Additionally we would like to point out that we believe that the modelling should include cumulative effects of other industrial activity close to the site, such as the biomass boiler(s) operated by the farmer, plus general farming activities such as ploughing and harvesting, because these will also contribute to the PM_{2.5} and PM₁₀ loadings. There is obvious concern about the particulate levels during the building phase. The

limited headroom available will also restrict the potential for any future development in the area and particularly at Cononsyth.

Regarding meteorological data, it is obviously totally unsatisfactory to use data collected at Strathallan. Cononsyth is close enough to the coast to be subject to sea breezes, so although the prevailing wind direction might be south westerly, we frequently experience easterly winds, particularly in summer. Additionally, these are often associated with haars which we would expect to interfere with the dispersion of the pollution plumes emitted from the sheds, resulting in localised concentrations of harmful pollutants. Therefore we believe that the modelling must include easterly winds, the coastal nature of the site and the impact on air quality for properties to the west of the proposed development.

The Applicant claims that an important reason for choosing this particular site on his land is because it is flat, so there is absolutely no justification for then using a gradient of 1:10 (10%) in air quality modelling. In fact, we calculate that the maximum gradient across the full range, south to north is -2.6%.

Again we are concerned by the omissions and casual approach adopted by the applicant, why has ammonia been ignored when it is the major pollutant from this type of industrial operation? Why present just one year's data when modelling assessments should be based on five different years of meteorological data, with a minimum of three years? Also, can the Council request SEPA to explore the "extraordinarily low" odour values with the Applicant. We are concerned that the inputs to the modelling used to derive these values are also unrealistic.

As vulnerable receptors we request that both the Council and SEPA apply the maximum degree of scrutiny to this application. We have been disappointed by the quality and accuracy of the information which the Applicant has provided so far in this process for a development which has the potential to cause serious harm both to us and the wider environment.

Yours sincerely
Mike Rushforth

M. Rushforth & M. Malcolm Summerhill House DD8 2SR

Also on behalf of:

S Batty & L Durham Denton Mill Cottage DD8 2SR
J E Bell East Mains Of Dumbarrow Cottage DD8 2SR
A & I Grant South Park of Gardyne DD8 2SR
S & A Leaver West Mains of Gardyne DD8 2SR
V McMillan Summerhill Cottage DD8 2SR
J B Stewart Kirkden School House DD8 2SR
A & J Skilton Queenswood Cottage DD8 2SR
D & D Stanley East Mains of Dumbarrow DD8 2SR
A Whitehead & D Liddell Midpark of Gardyne DD8 2SR

To: Mr. R. Kelly, Planning Officer(Development Standards) Angus Council

**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**

I wish to register an objection to this development associated with its visual impact on the landscape.

Referring to Appendix 7.1 in the COGEO EIA Report, the viewpoint locations and associated text appears to have been prepared by someone not very familiar with the area. Whilst the “main road” (in fact the B961) will carry most traffic, the Pressock-Cononsyth road (U467) is much more important to those of us who live in the area and those who use it for recreational purposes because it is a popular route for cyclists, horse-riders, walkers and dog walkers with long distance views to The Glens and Strathmore.

The general views along this road from Pressock to Summerhill are restricted due to landform and hedges, but the vista opens up significantly when travelling south beyond Summerhill. The long distance views are obviously highly accessible travelling north down the road from Cononsyth.

According to Table 7.2 COGEO EIA Report, the many visual receptors using this road would be classified as **High Sensitivity**: *“People who are engaged in outdoor recreation, whose attention or interest is focused on the landscape and on particular views (e.g. strategic footpaths, cycle routes or rights of way, picnic areas, public viewing areas)”*.

Similarly, the Magnitude of Change must also be classified as **High Magnitude of Change** (Table 7.3 in the same document): *“Where the proposal would cause a significant change affecting the character of the landscape or key characteristics. Size of development would be wholly out of scale with existing features”*. These are indisputable facts for those of us who live in this area and those who use it for recreational purposes. Taken together they make the development unacceptable to us and result in a Major Magnitude of Change, according to Table 7.4 COGEO EIA Report.

I would suggest that the applicant should be requested to submit more visualizations of the proposed development taken from viewpoints along the U467, south of Summerhill, looking east and north east. An obvious viewpoint would be at the original gateway into the field to the south of Summerhill, which is one of the few points along the road where it is safe to stop and enjoy the view. This would be far more relevant than some of the viewpoints chosen and most importantly, would provide a better understanding for all concerned on the true impact of the development on the locality. The photo at the end of this document was taken from the suggested viewpoint.

Camera: CANON EOS 1200D :
Lens: 35mm CROPPED-FORM SENSOR :
Date: 25.07.2021: 19.01
GPS: 2°-42'-2565.63" : 56°-36'2192.25"
Direction: 35° NE

A prime 35mm lens with a cropped sensor was used as suggested in the Landscape Institute’s Visual Representation of Development Proposals Technical Guidance Note 06/19 using a tripod height of 1.5 metres. Whilst there are limitations to this equipment it is judged adequate for Type 1 Visualizations in these guidance notes.

The irrigation reel in the centre of the image is located within the area of the proposed site for the main buildings and is 3.81 metres in height, whereas the height of the buildings is 7.0 metres with silos being significantly taller. Therefore, the undulations in the land will not hide the buildings, despite claims to the contrary by COGEO. It also demonstrates that it will be many years before mitigation using trees to hide the buildings will become effective. Similar claims for mitigation by screening were made for the solar farm at Pressock and this construction, which has a much lower form, is still clearly visible several years later.

Another important aspect of this viewpoint is that it clearly shows how isolated the development will be from any similar buildings, contrary to the requirements of the Angus Local Development Plan.

This document was prepared following consultations with neighbours in the locality of the proposed development.

M A Rushforth

Summerhill House

DD8 2SR

01 August 2021



CANON EOS 1200D : 35MM CROPPED FORM SENSOR : 25.07.2021 GPS 2°-42'-2565.63"56o-36'2192.25" 35° NE

To: Mr. R. Kelly, Planning Officer(Development Standards) Angus Council

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

I wish to register an objection to this development associated with access roads and the failure of the applicant to show that other design possibilities have been considered for the site.

Cononsyth Farms Ltd. (CFL) created what is described as an “existing track” in the autumn of 2020, long after all logging operations had been completed in the adjacent wood, about the same time as the original planning application was submitted. The access from the track onto the U467 was subsequently widened by the destruction of a further length of dry-stone dyke.

In constructing this access and track, CFL showed little consideration for our amenity because it runs within feet of the southern end of our garden. We suffer from noise and dust caused by heavy farm traffic using this track and on occasions tractors and other vehicles have been parked there for periods of time with their engines running causing pollution obvious in our garden.

CFL’s insistence on using this access point has the knock-on effect of requiring major changes to be made with the introduction of passing places which will have a major negative impact on this area. The U467 is a popular route for walkers, cyclists and horse riders and these changes will irreversibly affect the character of this country lane. The amount of traffic on the U467 is probably restricted because of the limited width of the road. There is concern locally that introducing passing places will encourage motorists to use this route as a short-cut between the A932 at Pitmuies and the B961 at Cononsyth.

Additionally, there is concern about the hazardous junction where the U467 meets the B961 where there are frequent accidents, and whilst only one accident may have been reported in recent years, there have been two since Christmas 2020 and locals will attest to the fact that there have been several accidents on or near this junction in the past five years.

COGEO argue that the recently created farm track is the only way the sheds can be accessed without impacting biosecurity. It should be noted that this track will be adjacent to the range area for some of its length, which is judged not to create a biosecurity risk. Presumably the hens will be separated from the track by some form of fencing.

However, alternative layouts for the proposed sheds would permit direct access to the sheds from the gateway on the B961 adjacent to Cononsyth House. As in the current proposal, the hens could be separated from the track by fencing and also hedging which in time would help hide the presence of the buildings.

From a sustainability point of view this would be desirable because it would significantly reduce the building works and consequent pollution from building lay-bys along the U467

Photo 1 below is a Google Earth image of an industrial poultry unit at Sally Farm, Helperby, N. Yorks YO61 2SA. This consists of two 32,000 capacity sheds for layers and it is described as a state-of-the-art installation for high welfare egg production (see following link).

<https://www.vencomatic.co.uk/post/showcasing-the-future-of-commercial-egg-production-at-the-sally-farm-open-days>

This image clearly shows that the access road bisects two range areas presumably without impacting biosecurity, otherwise it would not be operating.

Although the sheds are the same size as those in the current proposal the staff and packing facility with loading and unloading areas is located differently. If the same design were applied to the current proposal, with the staff/ packing/ loading area to the south of the buildings in a similar format to the Sally Farm example, a number of benefits would accrue:

1. There could be direct access from the B961 at an existing farm gate adjacent to Cononsyth House, thereby eliminating all the concerns associated with traffic hazard and traffic density on the U467.
2. The development would have significantly less impact on the amenity of those living in the Summerhill and Gardyne areas.
3. Receptors in Summerhill and Gardyne would be largely shielded from noise arising from the loading/ unloading area.
4. This would be a more sustainable solution because it would eliminate the construction work necessary to make the U467 accessible to articulated vehicles.
5. Site security would be simplified.



Photo 1 Sally Farm showing two 32k sheds and access road with central staff/ packing facility.



Photo 2. @SallyFarms 20 July 2021. View showing four range areas.

“Sally Farm demonstrates the highest standards of welfare, efficiency and profitability that will become the benchmark for the commercial free-range egg industry in the UK.”

<https://www.poultrynews.co.uk/production/egg-production/egg-farm-permanently-open-to-the-public-set-to-expand-in-yorkshire.html>

Therefore I do believe that COGEO should be asked to re-think the design of the sheds and consequent location of the access road. If the Sally Farm operation was designed as a demonstration of best practice for high welfare egg production, then arguments against rethinking the design at Cononsyth for reason of “operational grounds” and “biosecurity” are clearly not valid.

This document was prepared following consultations and input from neighbours in the locality of the proposed development.

M A Rushforth

Summerhill House

DD8 2SR

01 August 2021

To: Mr. R. Kelly, Planning Officer (Development Standards) Angus Council

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

I wish to register an objection to this development associated with the manner in which COGEO operated the PAC process, contrary to requirements contrary to the requirements of the Scottish Government's guidance, at that time.

This document looks at Cogeo's response and failings with regard to "Scottish Government Guidance: Covid 19 Emergency and Pre-application Consultation and Requirements for a Public Event".

Section 14.ii) Identify the location of the site

The on-line image to identify the site was inadequate and it failed to clearly define the boundaries without becoming pixelated.

Section 14.iv) Be as user friendly as possible

It appeared that it was essential to answer a questionnaire – this would be off-putting to many people and would appear to conflict with the requirement in Paragraph 20 Note 4 that members of the public should not have to join or sign-up to a particular website/ forum.

Section 20 On-line sessions scheduled to facilitate public participation

The session was held on a weekday between 14.00 and 16.00, making it difficult for people in fulltime employment to attend.

Section 20 Note (7) Response to questions or clarification.

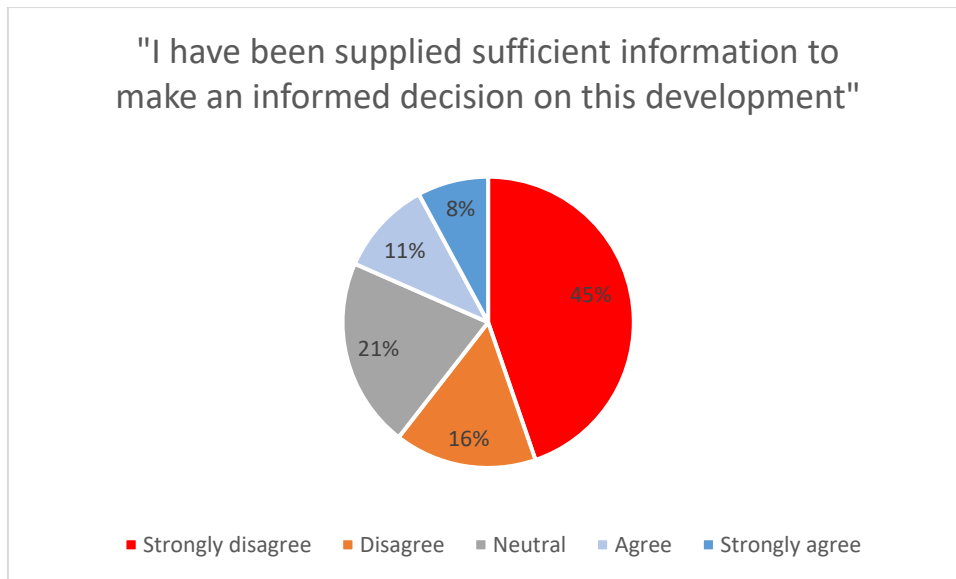
During the course of the consultation, representatives of Cogeo offered to supply further information after the event but failed to do so.

Section 25. Make provision for access opportunities, and provide contact numbers for free calls or calls at no more than local rate.

Cogeo only provided a national-rate number for contact other than via the internet.

There was general dissatisfaction that the consultation process was held in private which inhibited the exchange of information.

Of the 38 participants in the consultation process, 61% disagreed that they had received sufficient information from Cogeo to make an informed decision about the development whereas only 19% agreed that they had received sufficient information.



(Source – Cogeo)

What is a “Public Conversation – a conversation in public (usual meaning) or a conversation with the public?”

At some point, COGEO changed its view on whether the consultation should be conducted in a public forum or privately. In their feedback from the public conversation they stated:

“Live Event Format (Page 10 Public Conversation Overview)

We understand that some respondents were unhappy with the format of the live event and we would like to take this opportunity to provide a formal response.

- *Our goal throughout this process has always been to provide information and allow interested parties to be heard confidentially. We appreciate that some people do not have the confidence or desire to air their views in a public forum, particularly if their view differs from others. To make sure everyone had a fair chance to speak and to hear all views equally, we made the decision to use the Live Chat format. We felt that this was the closest replication of the private conversations we would normally have during a drop-in event.*
- *We included full details of the event in the Pre-Application Notice submitted to Angus Council who have confirmed that the consultation event meets the criteria of the temporary Scottish Government Planning Guidance. We acknowledge that this may not be the preferred format for some of you, but we have a responsibility to ensure accessibility and fairness for all and we did not feel a video conference format met that criteria.”*

The following is a verbatim extract of the original PAN **(20/0638 PAN)** from COGEO with reference to this development, and the reference to Easter Meathie is in the original submission on behalf of Cononsyth Farms Ltd.!

“Re - Proposal of Application Notice Version 1.0 Dated 25.08.2020

North Mains of Cononsyth

Public Event (Page 7)

The statutory minimum requirement for consultation states that at least one public event must be held where members of the public are invited to make comment to the prospective applicant on the proposal. However, the temporary guidance indicates that as a minimum temporary substitute for a face to face public event, the information should be hosted at a central, free, publicly accessible web location.

In order to comply with such requirements, a website will be created to host information of the proposal ensuring it is accessible to all members of the public. The dedicated website will be user friendly and accessible as possible, and will include:

- The pre-application consultation steps being undertaken,*
- The location of information,*
- Details of how the public can engage and the time limits set for engagement,*
- The location of the development site,*
- Details of the proposed development onsite.*

Furthermore, the Scottish Government Guidance states that at least one live and interactive web-based consultation event must take place, lasting a minimum of two hours. As such, Cogeo will host a live event via the Microsoft Teams platform where interested parties will be able to attend and gain a better understanding of the major development proposed at Easter Meathie (sic). Details of the live event will be published on the dedicated website ensuring that it is accessible to all.

At some point COGEO obviously must have undertaken some market research to show that people did not have the confidence to speak in public about their views. Microsoft Teams is designed to enable group discussion, that is its whole purpose. The following is a verbatim extract of the original PAN from COGEO with reference to this development, and the reference to Easter Meathie is in the original submission!

Contrary to assertions by Cogeo, nobody who participated in the consultation has been found who favoured the private nature of the process. We have been able to contact 27 of the 38 people who participated in this consultation (71%) and every one expressed disappointment that it was not conducted as they had expected in a public forum, so this was hardly a majority view that it should be conducted in private sessions. What evidence does COGEO have that this was the preferred format.

M A Rushforth
Summerhill House
DD8 2SR

1st August 2021

21/00337/FULM 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. Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

I wish to lodge an objection to this application following the publication of a further air quality impact assessment by COGEO¹.

3.1.4 Description of Odour Impacts¹

The location chosen for the sheds still means that there are residential properties not associated with the farm at distances of 343m and 380m, contrary to PEPFAA guidance, which states that sites within 400m of units of this type should be avoided. Local residents contest claims that they will not be affected by noise, odour and emissions from the sheds. No evidence has ever been presented for the consideration of alternative sites owned by Cononsyth Farms Ltd. and not necessarily located at Cononsyth. The development will have a major adverse impact on the local landscape. (The location is contrary to **ALDP DS 4 Amenity** and **PV6 Development in the Landscape.**)

6.2.5 Terrain and Land Use¹

I question the validity of applying terrain effects in the modelling. This is open country and does not have gradients greater than 1:10. In fact, the gradient across the proposed site is 1:56 and I think identifying the land as having a “rolling nature” is disingenuous and would probably give more favourable modelling results in terms of greater dispersion.

6.2.7 Uncertainty¹

The modelling is only as good as the information that is put in and the validity of the assumptions made. In the interests of openness, it would have been good if COGEO had shown the impacts of the different assumptions made during the modelling process and the effect on the results obtained.

6.4.3 Accounting for Short Term Operation¹

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 at North Mains of Cononsyth (see various supporting documents in Reference 2). The operation hours of 2431h/annum seem very unambitious, representing approximately 30% of a 46-week year working on a single shift basis. The applicant should be asked to model the impact of longer operating hours on particulate emissions, otherwise provision should be made to limit the operating hours for the boilers to 2431 hours/annum.

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. It seems highly likely that the wood-chipping operation will also contribute to PM_{2.5} emissions.

7.3.1 Annual Mean Objective

The results in Table 7.1¹ confirm the comment made by SEPA in their submission that there is little headroom for any error in the modelling process³. No consideration is given to the PM_{2.5} emissions which is disappointing because it is these particles that are recognised as being the most harmful and are of concern to us who live and work from home 24/7 in the

vicinity of this proposed development. The recently published “Cleaner Air for Scotland 2”⁵, cited studies⁶ which concluded that in Scotland approximately 2,000 deaths per annum could be associated with particulate emissions. Paragraph 28 in Reference 5 notes the action taken by the Scottish Government to address the health issues associated with particulates:

“Taking this evidence into account, in 2016 Scotland became the first country in Europe to adopt into domestic legislation the World Health Organization (WHO) guideline value for PM_{2.5} of 10µg/m³ as an annual mean, meaning that local authorities are required to take action to reduce PM_{2.5} levels in areas where this objective is being exceeded. At the time of publication, the WHO was in the process of reviewing this guideline value.”

Referring to Table 7.1¹, the highest PEC concentration for receptors not associated with Cononsyth Farms Ltd. is 12µg/m³. Using the current guidance from the Air Quality Expert Group to the Department for Environment, Food and Rural Affairs, the PM_{2.5} emissions can be calculated as 75% of the annual PM₁₀ emissions⁷. Therefore, the highest PM_{2.5} emission would be 9.0µg/m³ based on the data in Table 7.1. According to Table 1.1 in LAQM-TG16⁴, the air quality objective for PM_{2.5} in Scotland is 10µg/m³, so the long-term in fact the **PEC is 90% of the air quality objective**, significantly higher than the 67% claimed for PM₁₀ emissions. If all sources of pollution at Cononsyth were considered, then it seems likely that the PM_{2.5} annual objective of 10µg/m³ is highly likely to be exceeded.

Roads and Access

The latest submission from COGEO again fails to address the concerns of local residents regarding the access point chosen by the farmer to the proposed development. The proposed access track was created about the same time as the original submission of a planning application for the chicken sheds and shows little consideration for our amenity because it passes within feet of the southern end of our garden. Having seen the projections for the levels of particulate pollution in the vicinity of the various properties in the Summerhill area, I am increasingly concerned about the proximity of this main access track to our house. Traffic accessing the sheds will lead to an increase in pollution in the area, from exhaust fumes, dust and bio-particles.

As I have pointed out before there are alternative routes possible from the B961 to the proposed site, without using the U467. The U467 is an important amenity and access route for those of us living in Gardyne and I do not see the introduction of several passing places reducing the problem or reducing the hazard at the junction with the B961. In fact, it is highly likely that introducing passing places will increase the density of traffic on this country lane because the current narrowness of the road will deter some potential users. This increased flow of faster moving traffic will increase the hazard to the walkers, cyclists and horse riders who see the lane as an important part of their amenity. Also the introduction of passing places will have an adverse impact on the local landscape (Contrary to **Policy PV6.**

Development in the Landscape).

Although farmers can make significant changes on their land without planning permission, I think that this should be done in a manner which respects the rights of their neighbours and should not have a detrimental effect on their environment or amenity and they should be guided by the Local Development Plan (**ALDP-Policy DS4 Amenity**). The proposed access track will have a massive impact on our environment and amenity.

The access point to the sheds does not have to be at the western end of the sheds – it could be centrally located on the southern side to facilitate a North-South access track. The

argument against this from COGEO is that having traffic passing through the ranges on a track running north from the B961 would represent a bio-security issue. However, as I have pointed out in a previous submission Sally Farms (“the home of high welfare poultry”) operate a 64k free range egg production unit on this basis⁸. Nearer home, Craignathro Farms near Forfar have a central access point to their 32K free range hen shed, again with the access road running between the ranges (see Figure 1). Even in the COGEO proposal, the access track runs adjacent to an area of range, so “bio-security” is really not an honest or valid argument against having a north-south access to the site from the B961. This would reduce pollution levels in the area of Summerhill, retain the amenity for users of the U467 and eliminate the road safety concerns associated with higher traffic levels negotiating the B961-U467 junction.



Figure 1. Image of installation at Craignathro Farms, near Forfar, of 32k free range egg production unit, showing the four range areas and access road between the ranges.
Source: Google Earth.

Because the combined developments at Cononsyth are likely to equal, if not exceed emission levels for particulates, I believe that removing traffic away from vulnerable receptors at the four properties at Summerhill would be an important factor in reducing the risks associated with this proposed development. In a similar vein, I believe that COGEO should not be able to scope-out the construction phase of the development, because this will make a considerable contribution to particulate emissions and will represent a particular threat to those of us living in the four properties near the proposed access road off the U467. We are all retired or work from home, and many have long term health issues and so could be regarded as vulnerable and at risk from these elevated pollution levels.

References

1. “Air Quality Impact Assessment”. North Mains of Cononsyth Version 1.2 (08/2021)
2. 21/00024/FULL. Installation of a 900kW Biomass Boiler System and Associated Works including the Installation of a 12.7m Flue. North Mains Of Cononsyth. Cononsyth Arbroath DD11 3SA
3. Communication Alasdair Milne to Ruori Kelly, 09 June 2021. “RE: Consultation Request - Planning Application”. Angus Planning Portal.
4. Local Air Quality Management Technical Guidance (TG16) April 2021.
5. <https://www.gov.scot/publications/cleaner-air-scotland-road-healthier-future/>
6. https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1212141150_AQEG_Fine_Partuculate_Matter_in_the_UK.pdf
7. <https://www.scottishairquality.scot/assets/documents/Health-Environment-Working-Group-Report.pdf>
8. <https://www.vencomatic.co.uk/post/introducing-sally-farm-the-home-of-high-poultry-welfare>

M A Rushforth
Summerhill House
DD8 2SR
15 September 2021

From: [REDACTED]
To: [Ruari Kelly](#)
Subject: 21/00337/FULM 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. Field 530M West Of North Mains Of Cononsyth Farm Con...
Date: 08 October 2021 10:51:01

. Dear Mr. Kelly,

I really am sorry to be troubling you again with my concerns about the above application. However, I feel it would be remiss of me not to point out yet another example of mis-information presented in association with this application, arising from documents recently published on the portal.

On 16 September, an EIA Report on Noise Assessment by Sharps Redmore, working under the instruction of Cononsyth Farms Ltd. (CFL), was published which clearly describes the feed delivery process in paragraphs 4.11 and 4.12.. In summary the feed will be mixed at "the main farm location" and several journeys will then be made to deliver the feed to the on-site silos. This will occur twice a week, so the feed delivery process will comprise twenty eight transits per week between the main farm location and the sheds.

On 5th October, the following comment was made in a submission by Environmental Health: "I note there have been objections citing air quality impacts of delivery vehicles have not been assessed, however as there are only 2 feed deliveries per week and 2 egg collections per week, the increase in PM10 will be very small to the point of unquantifiable in terms of modelling." Whenever any objection has been raised locally concerning the increased traffic flow, the standard response from COGEO and CFL has always been that the only additional traffic will be two feed deliveries and two egg collections per week! The Sharps Redmore description of the feed delivery process is much more credible if CFL plan to mix the feed locally.

In my opinion, the difference between 4 and 28 transits per week is highly significant and impacts conclusions already drawn about traffic, pollution and the siting of the access road and invalidates many of the conclusions erroneously drawn on the earlier statements by CFL and COGEO that there would only be two feed deliveries per week. A minor point is that the 28 transits of approximately two miles per transit will also destroy the sustainability argument made by COGEO and CFL of reducing haulage by using locally sourced grain.

I would appreciate it if you could lodge this comment as a further objection on the portal.

Kind regards
Yours sincerely
Mike

Mike Rushforth
Summerhill House
Guthrie
Forfar DD8 2SR

Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

Customer Details

Name: Mr Graeme Laird

Address: Not Available

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Have to object to this development

On Health Environment Noise and Pollution Grounds

Congestion of Roads in the Area with Extra HGV and other traffic.

Dundee Road in particular with the increase already of heavy Traffic Housing developments this will add even more vehicle Traffic which will cause more noise pollution and be hazardous to both residents living here

Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

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: Regarding the Noise Assessment Report 2020039 (15 September 2021) provided by Sharp Redore, the author is obviously not familiar with the area or some of the farming activity in the area and I believe therefore draws some erroneous conclusions.

I would draw attention to Para 2.13 and that for sensitive receptors the converse is true. The significance of a low level of noise impact can become unacceptable when the proposal is considered in context. For example, the character and level of the sound associated with the proposed industrial unit in a rural landscape will be totally out of character with the existing noise climate. Additionally, the receptors will be highly sensitive to this type of noise because they have made a choice to live in a rural rather than an urban or industrial location.

Section 4.1 Summerhill House is closer to the proposed buildings than Summerhill Cottage.

Section 4.2 No mention is made of collection of waste from the sheds or service vehicles.

Section 4.14 The recently created track passes within 2 metres of the garden of Summerhill House. Therefore, why is a correction factor of 72 metres applied?

Section 4.17. The feed delivery is constituted of several separate journeys according to Section 4.12 and it is disingenuous to suggest that it is a single journey. Also, the current use of the newly created track is highly seasonal and fourteen separate feed deliveries per week plus egg collection plus manure transport and all the other ancillary transport would represent a major change in noise source at Summerhill House. This is contrary to the erroneous conclusion drawn in Section 4.19.

Section 4.26. Again, this statement fails to clarify that a feed delivery involves multiple journeys and must be considered a new noise source.

Section 4.28. Creation of the access road immediately adjacent to the garden at Summerhill House fails to follow the guidance in PAN 1/2011 referred to in Section 2.2..

Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

Customer Details

Name: Mrs PHYLLIS JOLLY

Address: 8 The Den, Forfar, United Kingdom, DD8 2PY FORFAR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Further to my comment on 14 June 2021, the recent submission of a SEPA application merits further input.

TRAFFIC LEVELS: I noted the inevitable level of internal staff / vehicle movement there will be between the current centre of the farm business at North Cononsyth and the hen sheds. Intimation of plans to mix feed at North Cononsyth with frequent deliveries to site as opposed to 2 bulk deliveries a week supports my fears of a much higher level of incidental traffic than originally notified.

WATER COURSE POLLUTION: A layout drawing shows 2 connected swales with an overflow outlet discharging to a nearby "Farm pond". Information on the construction specification of this farm pond is not available; I would like an opportunity to inspect the existing pond and proposed swales (part of a rural SUDS) on site to help resolve my strong concerns over the HIGH risk of contaminated surface water finding its way into the relatively close water course downhill from the shed hard-standings, scratch areas, the designed swales and farm pond. Reference is made to the swale design normally being a depth of 60 cm but because of hen requirements for a dry free range area, the proposed design is for a depth of ONLY 40 cm. If the sheds were located at the upper level perimeter of the free range area a 67% reduction in swale capacity might be mitigated by an additional swale strip. Locating the hen sheds and the most contaminated parts of the development at the closest point to the lower level water course simply defies any logical process of design.

RESIDENTIAL PROTECTION: I participated in the on-line consultation, I have commented and again I have to take time to repeat the same question that the Applicant has yet to adequately answer. Why is this bad neighbour, industrial scale development not being located in close proximity to the existing centre of operations at North Cononsyth? The range area would be

unaffected; local residential amenity would be protected.

Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

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 to this proposed development on the grounds of:

1. Loss of prime agricultural land (ALDP-PV6).
2. Industrialization of a rural area when other brownfield sites are available (ALDP-DS1).
3. Artificial light will be to the detriment of wildlife e.g. bats and insects. (ALDP-PV5, PV6)
4. Fencing around the proposed site will obstruct natural wildlife corridors, again negatively affecting biodiversity.. (ALDP-PV4).
5. The increased traffic on country roads necessitated by this project is at odds with the Angus Council Plan's declared intention to deliver its programme of walking and cycling safer routes, supported by Scottish Government funding. (ALDP-DS4)

Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

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 would like to point out some incorrect observations and conclusions in the Sharp Redmore Report on Noise Assessment loaded onto the Planning Portal on 16 Sept. 2021. I live at Summerhill House and the southern end of our garden is approximately 6 feet from the track which the farmer has recently created with the intention of using as the only access route to the proposed chicken sheds.

I spend a lot of time working in our garden and I can clearly hear when any farm traffic is using this track. In fact, it is used infrequently, and this year has only been used for traffic associated with planting, irrigation and harvesting and weeks have gone by with no traffic movements. I therefore disagree strongly with the comment in paragraph 4.17 stating that there is an existing noise climate associated with the transit of farm vehicles.

Contrary to the conclusion drawn at 4.19., the occurrence of 28 transits per week would represent a major change in the character of the existing noise environment and have a significant impact on ambient noise levels. I am of the firm opinion that there will be an adverse impact from the unacceptable noise levels associated with feed deliveries.

It has previously been claimed by the farmer and his representatives that there would be just two feed deliveries per week, when in fact there will be fourteen. Coupled with egg collection journeys, and transits by service vehicles, this represents a major increase in traffic density using the U467 and this newly created track passing in close proximity to our house. This will have a major impact on our amenity (ALDP-DS4: Noise; Vibration levels; Odours; Fumes; Dust; Traffic movements, Loss of Privacy and Outlook) but could be prevented if the applicant was instructed to find an alternative access route to proposed development.

Comments for Planning Application 21/00337/FULM

Application Summary

Application Number: 21/00337/FULM

Address: Field 530M West Of North Mains Of Cononsyth Farm Cononsyth Arbroath

Proposal: 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

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Sally McLaren

Address: 35 West Hemming Street Letham Letham, Forfar DD8 2PU

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Angus does not need more of these huge industrial buildings destroying the countryside, the environment and the quality of life for residents. Quite apart from the whole moral question of keeping 64,000 birds in such conditions this proposal will irreversibly destroy prime farmland and put residents at risk from the continual emissions of poultry dust, ammonia and other biohazards, all of which are hazardous to health. I have seen calculations that state that in the first year of the development the site will produce more carbon dioxide than all the cars in Brechin, and then annually more CO2 than all the cars in Kirriemuir. If we are seeking to reduce the impact of farming on the environment this is a huge retrograde step. If such a huge unit, which could be placed almost anywhere, is allowed to be built on beautiful, high quality farmland, others will follow, condemning the residents of Angus to an industrial landscape, polluted waterways and a virus infected environment, much as they have in Wales with similar poultry units. There must be many other sites that can accommodate these types of units without destroying productive farmland and putting people and other animals at risk. Surely the Council can insist that these sites are considered before resorting to this drastic, irrevocable action. There must also be a significant risk of avian flu etc for migratory birds using Montrose Basin. This project does not make sense on a financial, environmental or practical level and should not be approved by a Council who has the interests of residents at heart.

From: [REDACTED]
To: [PLANNING](#)
Subject: Please don't open a chicken factory farming in the UK
Date: 18 June 2021 21:37:01

Tropical Earth



FAO Ruari Kelly. Case officer Angus council.

Objection to:

21/00337/FULM | 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 | Field 530M West Of North Mains Of Cononsyth Farm, Cononsyth, Arbroath.

Dear Ruari and the Planning Committee.

I ask that a copy of this letter is made available to the whole Committee delegated the task of assessing this application.

Please accept my objection to the above planning application.

My reasons are as follows:

HUMAN HEALTH:

PANDEMICS

We are in the middle of a pandemic that is killing people. Scientists have predicted that the next pandemic will start as an Avian Flu.

<https://www.cdc.gov/mmwr/volumes/66/wr/mm6635a2.htm>

Since November 2020 we have had 25 outbreaks of Avian Flu in the UK.

<https://www.gov.uk/guidance/avian-influenza-bird-flu>

Some of these have been outbreaks in Scotland itself :

[Avian influenza \(bird flu\): how to spot and report the disease - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/avian-influenza-bird-flu/pages/11.aspx)

On 18 February 2021, the National IHR Focal Point for the Russian Federation notified WHO of detection of avian influenza A(H5N8) in seven **human** clinical specimens. These are the first reported detection of avian influenza A(H5N8) in **humans**.

<https://www.who.int/csr/don/26-feb-2021-influenza-a-russian-federation/en/>

If we just look at the past 100 years of influenza pandemics, epidemics, and control strategies then the question must be whether another pandemic like the 1918 Spanish influenza, with such a deadly and disruptive impact on society killing 50 million people, is possible?

The answer is yes: it is not only possible, but it is just a matter of time.

It is important to note that there are concerns from many people in the UK of another impending pandemic of which a factory farm could well become the cause with their overcrowding and unhygienic conditions. Why on earth would a planning application for another Intensive factory farm even be considered at this time?

It is a massive risk to consider introducing an industrial chicken farm on such an enormous scale, **64000** birds, with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potential to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

It is noteworthy that the H5 group of highly pathogenic influenza viruses were never reported in humans before the mid-1990s; now they are found in humans in several countries every year.

The World Health Organisation (WHO) has said "... authorities have a responsibility for controlling zoonoses – diseases transmissible from animals to humans through direct contact or through food, water and the environment. An estimated 75% of emerging pathogens are of zoonotic nature".

Scientists estimate "that more than 6 out of every 10 known infectious diseases in people can be spread from animals" (Centers for Disease Control and Prevention <https://www.cdc.gov/onehealth/basics/zoonotic-diseases.html>)

Please consider this list of UK Government zoonotic diseases. It is a long and frightening list.

<https://www.gov.uk/government/publications/list-of-zoonotic-diseases/list-of-zoonotic-diseases>

To exemplify this further, listed UK diseases linked to just chickens (there are similar lists for other farmed species) include:

<!--[if !supportLists]-->• <!--[endif]-->Avian Flu (Animal influenza)

<!--[if !supportLists]-->• <!--[endif]-->Campylobacteriosis

<!--[if !supportLists]-->• <!--[endif]-->Psittacosis

<!--[if !supportLists]-->• <!--[endif]-->Salmonellosis

ANTIBIOTIC RESISTANCE

THE WHO states "Antibiotic resistance is one of the biggest threats to global health, food security, and development today." ([Antibiotic resistance](#))



and "If no action is taken - warns the (UN Ad hoc Interagency Coordinating Group on Antimicrobial Resistance) - drug-resistant diseases could cause 10 million deaths each year by 2050 and damage to the economy as catastrophic as the 2008-2009 global financial crisis. By 2030, antimicrobial resistance could force up to 24 million people into extreme poverty. Currently, at least 700,000 people die each year due to drug-resistant diseases, including 230,000 people who die from multidrug-resistant tuberculosis. More and more common diseases, including respiratory tract infections, sexually transmitted infections and urinary tract infections, are untreatable; lifesaving medical procedures are becoming much riskier, and our food systems are increasingly precarious".

(<https://www.who.int/news-room/detail/29-04-2019-new-report-calls-for-urgent-action-to-avert-antimicrobial-resistance-crisis>)

The WHO also state "Antibiotic resistance occurs naturally, but misuse of antibiotics in humans and animals is accelerating the process." (www.who.int/news-room/fact-sheets/detail/antibiotic-resistance)

The Soil Association says (www.soilassociation.org/reducing-antibiotics-in-farming/)

"Farm animals consume one-third of all antibiotics in the UK and it is intensive farming systems that use drugs at unnecessarily high levels, putting human health at risk."

"The routine use of antibiotics in intensive farming systems is driving this problem. Drugs are given to animals as a preventative measure - before they show signs of illness - to compensate for animals being housed in cramped, unsanitary conditions where infections spread fast. Intensively reared pigs and poultry account for 79 % of UK farming antibiotic use"

Looking holistically, what is more important, planning rules, another factory farm or people dying?

ENVIRONMENTAL IMPACT

The short-term benefits of employment and meat production are outweighed by the

environmental impact that it will have on the local area which is already facing a climate emergency. What we eat has a huge impact on the environment and has potential to cause disease and pandemics so applications should be considered in line with our broader responsibilities to protect future generations.

Furthermore, the Government sees Local Authorities as central to delivering its CO₂ emission targets yet more and more intensive farming applications are going through planning departments across the UK. It is important to recognise the significant impact just one factory farm will have on the pollution and environment of the local area.

To quote DEFRA 2007 - "The production of food from animal agriculture is a significant source of emissions in the UK, especially the production of GHGs and pollution of water sources. For pigs and poultry, the main pollutants are ammonia and N₂O. Nitrous oxide (N₂O) has 296 times the Global Warming Potential of CO₂ and ammonia (NH₃), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH₄, N₂O and NH₃, respectively (NAEI, 2007), nearly all of which is derived from livestock production."

<http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=14662>

If the science was clear in 2007, why are planning applications for intensive livestock units still being approved when the Government sees Local Authorities as central to delivering its CO₂ emission targets?

"Ammonia and nitrogen pollution, mostly from agriculture, is harming more than 60% of the UK's land area and affecting the most sensitive habitats, according to a DEFRA report. Ammonia pollution also affects species composition through soil acidification, direct toxic damage to leaves *and altering plants' susceptibility* to frost, drought and pathogens. At its most serious, certain sensitive and iconic habitats may be lost" ([Ammonia pollution harming 60% of UK land area](#))



LOCAL IMPACT and SITE-SPECIFIC INFORMATION

On the Angus Council Website there are various statements that the council has committed to which this type of development actively goes against, below are just a few excerpts:

We support the principle of sustainable development and are committed to improving the quality of life for present and future generations in Angus. By a process of integrating responses to environmental, social and economic issues the council will help to maximise human welfare while enhancing the environment in Angus.

We will seek to:

• *promote a sustainable approach to land and habitat management.*

• *protect and enhance local biodiversity.*

• *encourage a sustainable managed approach to public access to the natural environment.*

We will seek to:

• <!--[endif]-->reduce local pollution of air, land, water and to reduce the incidence of noise and light pollution.

We will seek to:

• <!--[endif]-->conserve and enhance the historic and the cultural heritage of Angus and the local characteristics of the towns and villages.

• <!--[endif]-->encourage design in new or regeneration developments which will improve access for the disabled and create an environment free from the fear of crime.

• <!--[endif]-->ensure that new developments are in line with sustainable development priorities in regard to location and design.

• <!--[endif]-->conserve and promote a network of greenspace within the built environment which links to the surrounding countryside through a footpath network.

The documented discussions from the Angus Council Development Standards Committee 15 Sept also mentions:

In this case the proposed development would involve the loss of prime agricultural land (Policy PV20); it would introduce a use that could generate odour and noise in proximity to existing residential uses (Policy DS4); it would have impacts on the landscape (Policy PV6) and it is located in an area where SEPA flood maps indicate there is a flood risk (Policy PV12 and 15).

Animal agriculture does not protect wildlife – quite the opposite – as this 2019 Defra report illustrates:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834432/evidence-compendium-26sep19.pdf

“Biodiversity - Farming practices can have many impacts that can lead to a reduction in wildlife biodiversity (including loss of habitats and food sources). The UK farmland bird index, an indicator of the state of wildlife generally, has fallen to less than half its 1970 value”.

According to Proceedings of the National Academy of Sciences - since humans became farmers, just 17% of wild mammal species remain (from mice to elephants).

As the site is relatively close to a number of residential properties this development can only have an increased negative effect on the local residents, in particular noise, odour, pollution and disease.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which could be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats.

GLOBAL HUNGER

The impact of factory farming also goes beyond the local environment to global food poverty and UK food insecurity. The Food and Agriculture Organisation of the United Nations predicts that by 2050 world meat production will have almost [doubled](#) global warming, pollution, deforestation, land degradation, water scarcity and species extinction all increasing as a consequence.

850 million people go hungry every day. Animal agriculture uses 83% of farmland but only produces 18% of calories (Joseph Poore, Oxford University).

“We already produce enough to feed the world. It’s overconsumption – especially of animal protein by the global middle class, inequality, waste and inadequate production/distribution systems - that stands in the way of enough food for everyone and space for wildlife. To feed the world in a way our one planet can sustain, we need to consume and produce food differently”. (Worldwide Fund for Nature. Appetite for Destruction)

ANIMAL SUFFERING

Another reason for my objection is that I do not feel this application for a factory farm represents current public opinion. In a recent survey 85% of the public were against Factory Farms.

In addition, Defra 2019 reported that a survey showed that 78% of people felt it was “very important” to protect the welfare of farmed animals and that 82% said farmers should be rewarded for offering animals higher welfare standards.

Although the current animal welfare laws in the UK are slim I feel it is morally wrong to subject sentient animals capable of fear and misery to overcrowding, unhygienic conditions, large scale antibiotic use, mutilations without anaesthetic and no chance of a normal life. Factory farms like these result in close confinement aggression and arguably completely prevent any sense of normal behaviour as defined in the Animal Welfare Act 2006.

Whilst I appreciate that animal welfare is not a planning consideration, I would like to draw your attention to the recent Animal Aid investigation into another unit where the group exposed some terrible conditions. Footage showed hens with extensive feather loss, injured birds and several dead and decomposing birds left among the living. Conditions were extremely dirty with heavy dust and faeces accumulating. A very small percentage of the birds were outside ‘ranging’ during the daytime, this may be attributed to crowding and social hierarchy which prevents birds accessing pop holes. Some hens may never range outside. [Combwell egg farm operated by Fridays Ltd](#)



Two sheds are proposed for the purpose of accommodating 32,000 laying hens each, totaling 64,000 hen capacity at the site. In light of this, we really must question whether the health and welfare of an even larger population of birds can possibly be effectively monitored generally or safeguarded in an emergency situation. And more widely question whether such huge scale, vertical farming with many thousands of hens, can really constitute ‘free-range’.

Whilst sadly not a legal consideration it most certainly should be a moral one.

Plant based diets are gaining favour with the public as people of this country are recognising that they have been eating diets that are poor for their health and the links meat consumption has to cancer and cardiovascular disease. Vegans and vegetarians look set to make up a quarter of the UK population in 2025 and with vegetarian and vegan product sales expected to increase to £658m by 2021 it begs the question is another factory farm really right for this community?

SUMMARY

The future looks grim.

- More pandemics.
- A climate raging out of control.
- Environmental damage.
- Biodiversity loss.
- Global food poverty and UK food insecurity.

<!--[if !supportLists]-->• <!--[endif]-->Antibiotic resistance - antibiotics used to keep animals in cramped, unhygienic conditions alive until slaughter.

<!--[if !supportLists]-->• <!--[endif]-->Animal mutilations without anaesthetic and no chance of a normal life.

The science is clear. Factory farming of animals is a leading cause of all the above.

With this in mind, I write to ask you to protect today's children, from serious problems that will dominate their future if we do not act now. Not just pandemics but the climate crisis, environmental problems, antibiotic resistance..... it paints a horrifying picture.

The climate crisis is here but the greatest impacts of it will be felt by our own children. Biodiversity is being lost, environments destroyed, soil quality diminishing. Pandemics are already a threat and antibiotic resistance is growing.

I OBJECT strongly to this application on the above grounds.

Yours faithfully,

Simone Moraes

Tropical Earth

Email to: planning@angus.gov.uk

FAO Ruari Kelly. Case officer Angus council.

Objection to:

21/00337/FULM | 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 | Field 530M West Of North Mains Of Cononsyth Farm, Cononsyth, Arbroath.

Dear Ruari and the Planning Committee.

I ask that a copy of this letter is made available to the whole Committee delegated the task of assessing this application.

Please accept my objection to the above planning application.

My reasons are as follows:

HUMAN HEALTH:

PANDEMICS

We are in the middle of a pandemic that is killing people. Scientists have predicted that the next pandemic will start as an Avian Flu.

<https://www.cdc.gov/mmwr/volumes/66/wr/mm6635a2.htm>

Since November 2020 we have had 25 outbreaks of Avian Flu in the UK.

<https://www.gov.uk/guidance/avian-influenza-bird-flu>

Some of these have been outbreaks in Scotland itself :

[Avian influenza \(bird flu\): how to spot and report the disease - gov.scot \(www.gov.scot\)](http://www.gov.scot)

On 18 February 2021, the National IHR Focal Point for the Russian Federation notified WHO of detection of avian influenza A(H5N8) in seven **human** clinical specimens. These are the first reported detection of avian influenza A(H5N8) in **humans**.

<https://www.who.int/csr/don/26-feb-2021-influenza-a-russian-federation/en/>

If we just look at the past 100 years of influenza pandemics, epidemics, and control strategies then the question must be whether another pandemic like the 1918 Spanish influenza, with such a deadly and disruptive impact on society killing 50 million people, is possible?

The answer is yes: it is not only possible, but it is just a matter of time.

It is important to note that there are concerns from many people in the UK of another impending pandemic of which a factory farm could well become the cause with their overcrowding and unhygienic conditions. Why on earth would a planning application for another Intensive factory farm even be considered at this time?

It is a massive risk to consider introducing an industrial chicken farm on such an enormous scale, **64000** birds, with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potential to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

It is noteworthy that the H5 group of highly pathogenic influenza viruses were never reported in humans before the mid-1990s; now they are found in humans in several countries every year.

The World Health Organisation (WHO) has said "... authorities have a responsibility for controlling zoonoses – diseases transmissible from animals to humans through direct contact or through food, water and the environment. An estimated 75% of emerging pathogens are of zoonotic nature".

Scientists estimate "that more than 6 out of every 10 known infectious diseases in people can be spread from animals" (Centers for Disease Control and Prevention <https://www.cdc.gov/onehealth/basics/zoonotic-diseases.html>)

Please consider this list of UK Government zoonotic diseases. It is a long and frightening list. <https://www.gov.uk/government/publications/list-of-zoonotic-diseases/list-of-zoonotic-diseases>

To exemplify this further, listed UK diseases linked to just chickens (there are similar lists for other farmed species) include:

- Avian Flu (Animal influenza)
- Campylobacteriosis
- Psittacosis
- Salmonellosis

ANTIBIOTIC RESISTANCE

THE WHO states "Antibiotic resistance is one of the biggest threats to global health, food security, and development today." (<https://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance>)

and "If no action is taken - warns the (UN Ad hoc Interagency Coordinating Group on Antimicrobial Resistance) – drug-resistant diseases could cause 10 million deaths each year by 2050 and damage to the economy as catastrophic as the 2008-2009 global financial crisis. By 2030, antimicrobial resistance could force up to 24 million people into extreme poverty. Currently, at least 700,000 people die each year due to drug-resistant diseases, including 230,000 people who die from multidrug-resistant tuberculosis. More and more common diseases, including respiratory tract infections, sexually transmitted infections and urinary tract infections, are untreatable; lifesaving medical procedures are becoming much riskier, and our food systems are increasingly precarious".

<https://www.who.int/news-room/detail/29-04-2019-new-report-calls-for-urgent-action-to-avert-antimicrobial-resistance-crisis>

The WHO also state "Antibiotic resistance occurs naturally, but misuse of antibiotics in humans and animals is accelerating the process." (www.who.int/news-room/fact-sheets/detail/antibiotic-resistance)

The Soil Association says (www.soilassociation.org/reducing-antibiotics-in-farming/)

"Farm animals consume one-third of all antibiotics in the UK and it is intensive farming systems that use drugs at unnecessarily high levels, putting human health at risk."

"The routine use of antibiotics in intensive farming systems is driving this problem. Drugs are given to animals as a preventative measure - before they show signs of illness - to compensate for animals being housed in cramped, unsanitary conditions where infections spread fast. Intensively reared pigs and poultry account for 79 % of UK farming antibiotic use"

Looking holistically, what is more important, planning rules, another factory farm or people dying?

ENVIRONMENTAL IMPACT

The short-term benefits of employment and meat production are outweighed by the environmental impact that it will have on the local area which is already facing a climate emergency. What we eat has a huge impact on the environment and has potential to cause disease and pandemics so applications should be considered in line with our broader responsibilities to protect future generations.

Furthermore, the Government sees Local Authorities as central to delivering its CO₂ emission targets yet more and more intensive farming applications are going through planning departments across the UK. It is important to recognise the significant impact just one factory farm will have on the pollution and environment of the local area.

To quote DEFRA 2007 - "The production of food from animal agriculture is a significant source of emissions in the UK, especially the production of GHGs and pollution of water sources. For pigs and poultry, the main pollutants are ammonia and N₂O. Nitrous oxide (N₂O) has 296 times the Global Warming Potential of CO₂ and ammonia (NH₃), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH₄, N₂O and NH₃, respectively (NAEI, 2007), nearly all of which is derived from livestock production."

(<http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=14662>)

If the science was clear in 2007, why are planning applications for intensive livestock units still being approved when the Government sees Local Authorities as central to delivering its CO₂ emission targets?

"Ammonia and nitrogen pollution, mostly from agriculture, is harming more than 60% of the UK's land area and affecting the most sensitive habitats, according to a DEFRA report. Ammonia pollution also effects species composition through soil acidification, direct toxic damage to leaves and by altering the susceptibility of plants to frost, drought and pathogens. At its most serious, certain sensitive and iconic habitats may be lost"

(<https://www.endsreport.com/article/1588258/ammonia-pollution-harming-60-uk-land-area>)

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

On the Angus Council Website there are various statements that the council has committed to which this type of development actively goes against, below are just a few excerpts:

We support the principle of sustainable development and are committed to improving the quality of life for present and future generations in Angus. By a process of integrating responses to environmental, social and economic issues the council will help to maximise human welfare while enhancing the environment in Angus.

We will seek to:

- *promote a sustainable approach to land and habitat management.*
- *protect and enhance local biodiversity.*
- *encourage a sustainable managed approach to public access to the natural environment.*

We will seek to:

- *reduce local pollution of air, land, water and to reduce the incidence of noise and light pollution.*

We will seek to:

- *conserve and enhance the historic and cultural heritage of Angus and the local characteristics of the towns and villages.*
- *encourage design in new or regeneration developments which will improve access for the disabled and create an environment free from the fear of crime.*
- *ensure that new developments are in line with sustainable development priorities in regard to location and design.*
- *conserve and promote a network of greenspace within the built environment which links to the surrounding countryside through a footpath network.*

The documented discussions from the Angus Council Development Standards Committee 15 Sept also mentions:

In this case the proposed development would involve the loss of prime agricultural land (Policy PV20); it would introduce a use that could generate odour and noise in proximity to existing residential uses (Policy DS4); it would have impacts on the landscape (Policy PV6) and it is located in an area where SEPA flood maps indicate there is a flood risk (Policy PV12 and 15).

Animal agriculture does not protect wildlife – quite the opposite – as this 2019 Defra report illustrates:

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834432/evidence-compendium-26sep19.pdf)

“Biodiversity - Farming practices can have many impacts that can lead to a reduction in wildlife biodiversity (including loss of habitats and food sources). The UK farmland bird index, an indicator of the state of wildlife generally, has fallen to less than half its 1970 value”.

According to Proceedings of the National Academy of Sciences - since humans became farmers, just 17% of wild mammal species remain (from mice to elephants).

As the site is relatively close to a number of residential properties this development can only have an increased negative effect on the local residents, in particular noise, odour, pollution and disease.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which could be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats.

GLOBAL HUNGER

The impact of factory farming also goes beyond the local environment to global food poverty and UK food insecurity. The Food and Agriculture Organisation of the United Nations predicts that by 2050 world meat production will have almost **doubled** global warming, pollution, deforestation, land degradation, water scarcity and species extinction all increasing as a consequence.

850 million people go hungry every day. Animal agriculture uses 83% of farmland but only produces 18% of calories (Joseph Poore, Oxford University).

“We already produce enough to feed the world. It’s overconsumption – especially of animal protein by the global middle class, inequality, waste and inadequate production/distribution systems - that stands in the way of enough food for everyone and space for wildlife. To feed the world in a way our one planet can sustain, we need to consume and produce food differently”. (Worldwide Fund for Nature. Appetite for Destruction)

ANIMAL SUFFERING

Another reason for my objection is that I do not feel this application for a factory farm represents current public opinion. In a recent survey 85% of the public were against Factory Farms.

In addition, Defra 2019 reported that a survey showed that 78% of people felt it was “very important” to protect the welfare of farmed animals and that 82% said farmers should be rewarded for offering animals higher welfare standards.

Although the current animal welfare laws in the UK are slim I feel it is morally wrong to subject sentient animals capable of fear and misery to overcrowding, unhygienic conditions, large scale antibiotic use, mutilations without anaesthetic and no chance of a normal life. Factory farms like these result in close confinement aggression and arguably completely prevent any sense of normal behaviour as defined in the Animal Welfare Act 2006.

Whilst I appreciate that animal welfare is not a planning consideration, I would like to draw your attention to the recent Animal Aid investigation into another unit where the group exposed some terrible conditions. Footage showed hens with extensive feather loss, injured birds and several dead and decomposing birds left among the living. Conditions were extremely dirty with heavy dust and faeces accumulating. A very small percentage of the birds were outside 'ranging' during the daytime, this may be attributed to crowding and social hierarchy which prevents birds accessing pop holes. Some hens may never range outside. <https://www.youtube.com/watch?v=O7ISh7cMOXA&list=UUQU-2dibbNDhtW7rHr3RG2g>

Two sheds are proposed for the purpose of accommodating 32,000 laying hens each, totalling 64,000 hen capacity at the site. In light of this, we really must question whether the health and welfare of an even larger population of birds can possibly be effectively monitored generally or safeguarded in an emergency situation. And more widely question whether such huge scale, vertical farming with many thousands of hens, can really constitute 'free-range'.

Whilst sadly not a legal consideration it most certainly should be a moral one.

Plant based diets are gaining favour with the public as people of this country are recognising that they have been eating diets that are poor for their health and the links meat consumption has to cancer and cardiovascular disease. Vegans and vegetarians look set to make up a quarter of the UK population in 2025 and with vegetarian and vegan product sales expected to increase to £658m by 2021 it begs the question is another factory farm really right for this community?

SUMMARY

The future looks grim.

- More pandemics.
- A climate raging out of control.
- Environmental damage.
- Biodiversity loss.
- Global food poverty and UK food insecurity.
- Antibiotic resistance - antibiotics used to keep animals in cramped, unhygienic conditions alive until slaughter.
- Animal mutilations without anaesthetic and no chance of a normal life.

The science is clear. Factory farming of animals is a leading cause of all the above.

With this in mind, I write to ask you to protect today's children, from serious problems that will dominate their future if we do not act now. Not just pandemics but the climate crisis, environmental problems, antibiotic resistance..... it paints a horrifying picture.

The climate crisis is here but the greatest impacts of it will be felt by our own children. Biodiversity is being lost, environments destroyed, soil quality diminishing. Pandemics are already a threat and antibiotic resistance is growing.

I OBJECT strongly to this application on the above grounds.

Yours faithfully
Sinh Quan

Email to: planning@angus.gov.uk

FAO Ruari Kelly. Case officer Angus council.

Objection to:

21/00337/FULM | 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 | Field 530M West Of North Mains Of Cononsyth Farm, Cononsyth, Arbroath.

Dear Ruari and the Planning Committee.

I ask that a copy of this letter is made available to the whole Committee delegated the task of assessing this application.

Please accept my objection to the above planning application.

My reasons are as follows:

HUMAN HEALTH:

PANDEMICS

We are in the middle of a pandemic that is killing people. Scientists have predicted that the next pandemic will start as an Avian Flu.

<https://www.cdc.gov/mmwr/volumes/66/wr/mm6635a2.htm>

Since November 2020 we have had 25 outbreaks of Avian Flu in the UK.

<https://www.gov.uk/guidance/avian-influenza-bird-flu>

Some of these have been outbreaks in Scotland itself :

[Avian influenza \(bird flu\): how to spot and report the disease - gov.scot \(www.gov.scot\)](http://www.gov.scot)

On 18 February 2021, the National IHR Focal Point for the Russian Federation notified WHO of detection of avian influenza A(H5N8) in seven **human** clinical specimens. These are the first reported detection of avian influenza A(H5N8) in **humans**.

<https://www.who.int/csr/don/26-feb-2021-influenza-a-russian-federation/en/>

If we just look at the past 100 years of influenza pandemics, epidemics, and control strategies then the question must be whether another pandemic like the 1918 Spanish influenza, with such a deadly and disruptive impact on society killing 50 million people, is possible?

The answer is yes: it is not only possible, but it is just a matter of time.

It is important to note that there are concerns from many people in the UK of another impending pandemic of which a factory farm could well become the cause with their overcrowding and unhygienic conditions. Why on earth would a planning application for another Intensive factory farm even be considered at this time?

It is a massive risk to consider introducing an industrial chicken farm on such an enormous scale, **64000** birds, with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potential to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

It is noteworthy that the H5 group of highly pathogenic influenza viruses were never reported in humans before the mid-1990s; now they are found in humans in several countries every year.

The World Health Organisation (WHO) has said "... authorities have a responsibility for controlling zoonoses – diseases transmissible from animals to humans through direct contact or through food, water and the environment. An estimated 75% of emerging pathogens are of zoonotic nature".

Scientists estimate "that more than 6 out of every 10 known infectious diseases in people can be spread from animals" (Centers for Disease Control and Prevention <https://www.cdc.gov/onehealth/basics/zoonotic-diseases.html>)

Please consider this list of UK Government zoonotic diseases. It is a long and frightening list. <https://www.gov.uk/government/publications/list-of-zoonotic-diseases/list-of-zoonotic-diseases>

To exemplify this further, listed UK diseases linked to just chickens (there are similar lists for other farmed species) include:

- Avian Flu (Animal influenza)
- Campylobacteriosis
- Psittacosis
- Salmonellosis

ANTIBIOTIC RESISTANCE

THE WHO states "Antibiotic resistance is one of the biggest threats to global health, food security, and development today." (<https://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance>)

and "If no action is taken - warns the (UN Ad hoc Interagency Coordinating Group on Antimicrobial Resistance) – drug-resistant diseases could cause 10 million deaths each year by 2050 and damage to the economy as catastrophic as the 2008-2009 global financial crisis. By 2030, antimicrobial resistance could force up to 24 million people into extreme poverty. Currently, at least 700,000 people die each year due to drug-resistant diseases, including 230,000 people who die from multidrug-resistant tuberculosis. More and more common diseases, including respiratory tract infections, sexually transmitted infections and urinary tract infections, are untreatable; lifesaving medical procedures are becoming much riskier, and our food systems are increasingly precarious".

<https://www.who.int/news-room/detail/29-04-2019-new-report-calls-for-urgent-action-to-avert-antimicrobial-resistance-crisis>

The WHO also state "Antibiotic resistance occurs naturally, but misuse of antibiotics in humans and animals is accelerating the process." (www.who.int/news-room/fact-sheets/detail/antibiotic-resistance)

The Soil Association says (www.soilassociation.org/reducing-antibiotics-in-farming/)

"Farm animals consume one-third of all antibiotics in the UK and it is intensive farming systems that use drugs at unnecessarily high levels, putting human health at risk."

"The routine use of antibiotics in intensive farming systems is driving this problem. Drugs are given to animals as a preventative measure - before they show signs of illness - to compensate for animals being housed in cramped, unsanitary conditions where infections spread fast. Intensively reared pigs and poultry account for 79 % of UK farming antibiotic use"

Looking holistically, what is more important, planning rules, another factory farm or people dying?

ENVIRONMENTAL IMPACT

The short-term benefits of employment and meat production are outweighed by the environmental impact that it will have on the local area which is already facing a climate emergency. What we eat has a huge impact on the environment and has potential to cause disease and pandemics so applications should be considered in line with our broader responsibilities to protect future generations.

Furthermore, the Government sees Local Authorities as central to delivering its CO₂ emission targets yet more and more intensive farming applications are going through planning departments across the UK. It is important to recognise the significant impact just one factory farm will have on the pollution and environment of the local area.

To quote DEFRA 2007 - "The production of food from animal agriculture is a significant source of emissions in the UK, especially the production of GHGs and pollution of water sources. For pigs and poultry, the main pollutants are ammonia and N₂O. Nitrous oxide (N₂O) has 296 times the Global Warming Potential of CO₂ and ammonia (NH₃), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH₄, N₂O and NH₃, respectively (NAEI, 2007), nearly all of which is derived from livestock production."

(<http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=14662>)

If the science was clear in 2007, why are planning applications for intensive livestock units still being approved when the Government sees Local Authorities as central to delivering its CO₂ emission targets?

"Ammonia and nitrogen pollution, mostly from agriculture, is harming more than 60% of the UK's land area and affecting the most sensitive habitats, according to a DEFRA report. Ammonia pollution also effects species composition through soil acidification, direct toxic damage to leaves and by altering the susceptibility of plants to frost, drought and pathogens. At its most serious, certain sensitive and iconic habitats may be lost"

(<https://www.endsreport.com/article/1588258/ammonia-pollution-harming-60-uk-land-area>)

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

On the Angus Council Website there are various statements that the council has committed to which this type of development actively goes against, below are just a few excerpts:

We support the principle of sustainable development and are committed to improving the quality of life for present and future generations in Angus. By a process of integrating responses to environmental, social and economic issues the council will help to maximise human welfare while enhancing the environment in Angus.

We will seek to:

- *promote a sustainable approach to land and habitat management.*
- *protect and enhance local biodiversity.*
- *encourage a sustainable managed approach to public access to the natural environment.*

We will seek to:

- *reduce local pollution of air, land, water and to reduce the incidence of noise and light pollution.*

We will seek to:

- *conserve and enhance the historic and cultural heritage of Angus and the local characteristics of the towns and villages.*
- *encourage design in new or regeneration developments which will improve access for the disabled and create an environment free from the fear of crime.*
- *ensure that new developments are in line with sustainable development priorities in regard to location and design.*
- *conserve and promote a network of greenspace within the built environment which links to the surrounding countryside through a footpath network.*

The documented discussions from the Angus Council Development Standards Committee 15 Sept also mentions:

In this case the proposed development would involve the loss of prime agricultural land (Policy PV20); it would introduce a use that could generate odour and noise in proximity to existing residential uses (Policy DS4); it would have impacts on the landscape (Policy PV6) and it is located in an area where SEPA flood maps indicate there is a flood risk (Policy PV12 and 15).

Animal agriculture does not protect wildlife – quite the opposite – as this 2019 Defra report illustrates:

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/834432/evidence-compendium-26sep19.pdf)

“Biodiversity - Farming practices can have many impacts that can lead to a reduction in wildlife biodiversity (including loss of habitats and food sources). The UK farmland bird index, an indicator of the state of wildlife generally, has fallen to less than half its 1970 value”.

According to Proceedings of the National Academy of Sciences - since humans became farmers, just 17% of wild mammal species remain (from mice to elephants).

As the site is relatively close to a number of residential properties this development can only have an increased negative effect on the local residents, in particular noise, odour, pollution and disease.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which could be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats.

GLOBAL HUNGER

The impact of factory farming also goes beyond the local environment to global food poverty and UK food insecurity. The Food and Agriculture Organisation of the United Nations predicts that by 2050 world meat production will have almost **doubled** global warming, pollution, deforestation, land degradation, water scarcity and species extinction all increasing as a consequence.

850 million people go hungry every day. Animal agriculture uses 83% of farmland but only produces 18% of calories (Joseph Poore, Oxford University).

“We already produce enough to feed the world. It’s overconsumption – especially of animal protein by the global middle class, inequality, waste and inadequate production/distribution systems - that stands in the way of enough food for everyone and space for wildlife. To feed the world in a way our one planet can sustain, we need to consume and produce food differently”. (Worldwide Fund for Nature. Appetite for Destruction)

ANIMAL SUFFERING

Another reason for my objection is that I do not feel this application for a factory farm represents current public opinion. In a recent survey 85% of the public were against Factory Farms.

In addition, Defra 2019 reported that a survey showed that 78% of people felt it was “very important” to protect the welfare of farmed animals and that 82% said farmers should be rewarded for offering animals higher welfare standards.

Although the current animal welfare laws in the UK are slim I feel it is morally wrong to subject sentient animals capable of fear and misery to overcrowding, unhygienic conditions, large scale antibiotic use, mutilations without anaesthetic and no chance of a normal life. Factory farms like these result in close confinement aggression and arguably completely prevent any sense of normal behaviour as defined in the Animal Welfare Act 2006.

Whilst I appreciate that animal welfare is not a planning consideration, I would like to draw your attention to the recent Animal Aid investigation into another unit where the group exposed some terrible conditions. Footage showed hens with extensive feather loss, injured birds and several dead and decomposing birds left among the living. Conditions were extremely dirty with heavy dust and faeces accumulating. A very small percentage of the birds were outside 'ranging' during the daytime, this may be attributed to crowding and social hierarchy which prevents birds accessing pop holes. Some hens may never range outside. <https://www.youtube.com/watch?v=O7ISh7cMOXA&list=UUQU-2dibbNDhtW7rHr3RG2g>

Two sheds are proposed for the purpose of accommodating 32,000 laying hens each, totalling 64,000 hen capacity at the site. In light of this, we really must question whether the health and welfare of an even larger population of birds can possibly be effectively monitored generally or safeguarded in an emergency situation. And more widely question whether such huge scale, vertical farming with many thousands of hens, can really constitute 'free-range'.

Whilst sadly not a legal consideration it most certainly should be a moral one.

Plant based diets are gaining favour with the public as people of this country are recognising that they have been eating diets that are poor for their health and the links meat consumption has to cancer and cardiovascular disease. Vegans and vegetarians look set to make up a quarter of the UK population in 2025 and with vegetarian and vegan product sales expected to increase to £658m by 2021 it begs the question is another factory farm really right for this community?

SUMMARY

The future looks grim.

- More pandemics.
- A climate raging out of control.
- Environmental damage.
- Biodiversity loss.
- Global food poverty and UK food insecurity.
- Antibiotic resistance - antibiotics used to keep animals in cramped, unhygienic conditions alive until slaughter.
- Animal mutilations without anaesthetic and no chance of a normal life.

The science is clear. Factory farming of animals is a leading cause of all the above.

With this in mind, I write to ask you to protect today's children, from serious problems that will dominate their future if we do not act now. Not just pandemics but the climate crisis, environmental problems, antibiotic resistance..... it paints a horrifying picture.

The climate crisis is here but the greatest impacts of it will be felt by our own children. Biodiversity is being lost, environments destroyed, soil quality diminishing. Pandemics are already a threat and antibiotic resistance is growing.

I OBJECT strongly to this application on the above grounds.

Yours faithfully