

**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** Objection to 21/00337/FULM  
**Date:** 07 June 2021 21:46:17

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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.**

The below reasons detail why I am opposed to the planning application. On the grounds of public health, environmental concerns, inconsistent with our local values, food insecurity, and animal welfare. I hope the information presented will close this application.

## **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/2.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:

- 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](http://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance))

The Soil Association says ([www.soilassociation.org/reducing-antibiotics-in-farming/](http://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 CO<sub>2</sub> 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 N<sub>2</sub>O. Nitrous oxide (N<sub>2</sub>O) has 296 times the Global Warming Potential of CO<sub>2</sub> and ammonia (NH<sub>3</sub>), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH<sub>4</sub>, N<sub>2</sub>O and NH<sub>3</sub>, 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 CO<sub>2</sub> 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.*

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](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-2dlbbNDhtW7rHr3RG2g>

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

Email to: [planning@angus.gov.uk](mailto:planning@angus.gov.uk)

FAO Ruari Kelly. Case officer Angus council.

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**Please accept my objection to the above planning application.**

Please stop this, these animals can't defend themselves and its not fair they have to live like that, I couldn't imagine how scary and horrible it is for them

My reasons are as follows:

## **HUMAN HEALTH:**

### **PANDEMICS**

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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).*

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I OBJECT strongly to this application on the above grounds.

Yours faithfully

# 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 Bill Atkinson

Address: 36 Rowan Avenue Northmuir Northmuir, Kirriemuir DD8 4TD

## Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:HUGE OBJECTION

It never ceases to amaze me in this day and age when environment is such a crucial issue and more especially as we have been living for the past year and a half through a continual and ever evolving spate of viral epidemics, that people have so little regard for what IPUs do to our land and our environment through the types of pollution brought about by these 'industries'. By pollution I refer to the loss of prime farmland which will NEVER recover from the vast numbers of birds roaming and leaving their droppings everywhere (a conservative estimate is in excess of 60,000 birds); the hugely offensive smell this will cause to the local and neighbouring areas: the air pollution from the industrial fans blowing the smell of the birds indoors (it's a rota system, some in some out); the vermin such as rats and flies that dead birds will attract and yes there will be dead birds as my friends down south who were subjected to this can confirm despite claims to the contrary; the potential for that vermin to spread disease; the huge likelihood that other birds, migrating birds, will carry pestilence with them; and all to make a quick buck!

I know that progress often means we have to diversify but this is not progress by any stretch of the imagination, neither for the local population, the environment nor the jobs market. Yes it is a fallacy that it will create local jobs as two people can and usually do man this type of operation very easily. I know one of a two man team who did just that.

I am incensed that this is being considered in Angus and cannot stress my objections strongly enough and am praying that Angus Planning Dept. will be able to see past this 'short term quick fix idea', because that is all it is, and look to the bigger picture or all our sakes.

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Case Officer: Ruari Kelly

## Customer Details

Name: Miss Caithleen Bell

Address: 18 Nelson Street Huntly AB548DE

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this develop for the following reasons;

- ALDP Policy DS1, emphasises the importance of prioritising brownfield sites over greenfield, and goes onto say that "development proposals in the countryside should also ensure that they have investigated all possibilities of locating adjacent to existing development or groups of buildings"

The applicant claims to have considered other sites for the development, but has not provided any detail of the locations, not the reasons for their rejection, contrary to the ALDP.

- ALDP Policy PV20 Soils and Geodiversity, which states that "Development proposals on prime agricultural land will only be supported where they: support delivery of the development strategy and policies in this local plan; are small scale and directly related to a rural business or mineral extraction; or constitute renewable energy development and are supported by a commitment to a bond commensurate with site restoration requirements." The proposed development is of major scale, is not a renewable energy development, and is therefore in direct contradiction to the ALDP. The development is therefore in direct contradiction to the ALDP

-NPF3 and ALDP PV11 Energy Efficiency, emphasises the need for carbon reduction, and the applicant will claim that the use of renewable energy sources, photovoltaic, wind, biomass boilers, will help them move towards carbon neutral. This is not the same as carbon zero. Our calculations (backed up by industry references) show that in the first year of the development, therefore including construction, this site will produce ca 2628 tonnes of carbon dioxide, and in its second and each subsequent year will produce ca 2142 tonnes. These figures represent approximately all the cars in Brechin in year one, and annually thereafter all the cars in Kirriemuir. This development is very high carbon production, contrary to the ALDP.

# 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: Miss Caithleen Bell

Address: 18 Nelson Street Huntly AB54 8DE

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**From:** [REDACTED]  
**To:** PLANNING  
**Subject:** OBJECTION to 21/00337/FULM | Erection of two 32,000 capacity free-range hen sheds  
**Date:** 07 June 2021 16:56:06

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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:

Mankind cannot continue putting profit before animal welfare. All farmed animals are sentient; to permit them to be used, abused and worked to death in totally unnatural environments is abhorrent. You are either striving to make the world a better place by supporting necessary change, or you just don't give a damn and couldn't care less. There is no middle ground. I hope you stand for change and are sufficiently bold to reject this planning application.

#### **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**.

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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".

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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](http://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance))

The Soil Association says ([www.soilassociation.org/reducing-antibiotics-in-farming/](http://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 CO<sub>2</sub> 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 N<sub>2</sub>O. Nitrous oxide (N<sub>2</sub>O) has 296 times the Global Warming Potential of CO<sub>2</sub> and ammonia (NH<sub>3</sub>), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH<sub>4</sub>, N<sub>2</sub>O and NH<sub>3</sub>, 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](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

Clare Dundas.

Sent from my Samsung Galaxy smartphone.

**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** FAO Ruari Kelly. Case officer Angus council.  
**Date:** 08 June 2021 08:23:17

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Objection to:

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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.**

**I find it extraordinary that this application has been made.**

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.

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“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.”

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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

David Finney  
Humane Being

# 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 Derek Smith

Address: Smithton Cockhill, carmyllie Arbroath Dd112rh

## Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: Would be great to see this project up and running bringing much needed jobs in these uncertain times helping maintain the rural economy and the production of low carbon, local produce which we should be producing rather than the import of foreign eggs ie Tesco with there eggs from Thailand etc , which will have less traceability and a much larger carbon footprint

**From:** [REDACTED]  
**To:** PLANNING  
**Cc:** [REDACTED]  
**Subject:** FAO Ruari Kelly, Case officer Angus council OBJECTION TO ARBROATH MEGAFARM  
**Date:** 08 June 2021 11:36:03

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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 email/letter is made available to the whole Committee delegated the task of assessing this application.

I am appalled and horrified by the submission of this planning application. This proposition seeks to inflict the most vile cruelty to millions of animals, in the middle of a climate change crisis requiring farmer assistance to transition all animal agriculture to plant-based agriculture - and slap bang in the midst of a global pandemic caused by animal farming no less!

I urge you in the strongest possible terms to reject this application outright for the sake of humanity and any other similar applications which may follow. This proposal sets out intent for gratuitous man-made violence to animals and nature, and is morally repugnant to any reasonable person. I therefore supply details of my objection below to comply with your process and implore the councillors to use their greater wisdom in the interests of current and future generations. 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.

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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)

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.

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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.

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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".

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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](http://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance))

The Soil Association says ([www.soilassociation.org/reducing-antibiotics-in-farming/](http://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.

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- 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:

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“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>

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I OBJECT strongly to this application on the above grounds.

Yours aye,  
Elizabeth M Lauren



**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** Hen Sheds  
**Date:** 07 June 2021 23:24:19

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FAO Ruari Kelly. Case officer Angus council.

Objection to:

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Furthermore, the Government sees Local Authorities as central to delivering its CO<sub>2</sub> 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 N<sub>2</sub>O. Nitrous oxide (N<sub>2</sub>O) has 296 times the Global Warming Potential of CO<sub>2</sub> and ammonia (NH<sub>3</sub>), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH<sub>4</sub>, N<sub>2</sub>O and NH<sub>3</sub>, respectively (NAEI, 2007), nearly all of which is derived from livestock production."

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Yours faithfully

Sent from my iPhone

**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** For Attention Of - Ruari Kelly (Case officer)  
**Date:** 08 June 2021 21:17:14

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21/00337/FULM

I would like to register my objection to the above application.

Firstly, I find it extraordinary that at a time when the world is focussed on the dangers of animal farming (ie regarding the current pandemic) such a thing should be contemplated.

There is also the environmental damage these facilities bring with them (pollution of water and other toxic damage).

Then there is the problem of antibiotic resistance which I hope you are fully aware of.

Please do not allow this facility to proceed.

Regards

Gary Kingsbury  
8 Briar Walk  
Edgware  
Middx  
HA8 0TX

# 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 Helen MacGregor

Address: EAST COTTON OF GARDYNE FARM COTTAGE ARBROATH DD11 3RX

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Please accept my objection to the above planning application on the following grounds:

1. The environmental impact of the site, of particular concern is noise, air and odour pollution which will have a detrimental effect on the character of the local area.
2. The plans show 5,586m<sup>2</sup> of buildings. The impact of this is considerable, even ignoring the 64,000 hens, the odour, noise and pollution concerns.
  - At what point is a building considered out of scale relative to the surrounding environment?
  - The mitigation measures seem to be: maintaining one informal path for locals to access, a single line hedge and 'sporadic tree planting' which looks from the plan (if the plan is specific?) like 100 trees. I would like to ask the committee to consider if these alterations are commensurate with the vastness of the build? (I note mention of '10 acres of planting'. How many trees is 10 acres of trees?)
3. I am further concerned about the lifespan of the project. Is this a sustainable option for the area? If this project is likely to result in land that is no longer of use as farmland in future decades, then I firmly object.
4. There is evidence of creep from Cononsyth being a farm to becoming an industrial site.
5. The Angus Development Plans point to the Development Plan Scheme 2020/21 | Angus Council which in turn points to Scotland and the sustainable development goals: a national review to drive action - gov.scot (www.gov.scot) which states "seek benefits for biodiversity from new development where possible,..." I can't see that this is included in a meaningful way in the current



plan.

6. It is deeply worrying that a project of this size may go ahead when the Angus Development Plan is being updated and at a time when our whole way of life is up for consideration as we enter a period of recovery in a post covid world and address the climate emergency. Please take a cautious approach to moving swiftly with this controversial development.

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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 James Barnett

Address: 44 Golf Road Park Brechin DD9 6YJ

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to object to this proposed development which will have an enormous impact on the landscape and character of the area. Normally new farm buildings grow up alongside existing ones and as such the impact on the character of the area is minimal. Dropping this size of industrial building into the required 80 acres is a totally new concept and will completely change the character of the area. It appears that the nearby residents will be severely affected by polluted flood waters, a constant cloud of noxious smells, toxic pollutants, viruses and harmful bacteria. Bird flu outbreaks are increasing every year, with more transmissions to humans in the past 15 yrs than in the entire 20th century. 64,000 birds will be roaming close to houses depositing literally tons of wet, noxious manure in fields directly adjacent to peoples' homes. It used to be that such units were in remote, unpopulated areas. To deliberately site them close to homes is criminal. What has happened to the Council's obligation under the Local Plan to protect the environment or amenity of residents or indeed protecting and enhancing the quality of the landscape in Angus?

Developments have to be proportionate and responsibly managed. This is neither and flies in the face of all the policies developed by the Council. When is the Council going to stand up for individuals who will find their lives blighted by such industrialisation of the countryside. I cannot see how this proposal can bring any benefit, long or short term to the local community and must be rejected.

# Comments for Planning Application 21/00337/FULM

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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 James Watt

Address: White Cottage Easter Meathie Farm Forfar DD82LF

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to object to the proposed IPU.

The Intensive Poultry Unit is of a size and structure incompatible with open farmland and typical farm buildings. It does not fit the locality.

The alternative sites considered should be disclosed and their pros and cons set out to allow proper evaluation.

80 acres of prime farmland will be irretrievably altered for potential short term gain.

6 residential properties are within 370mtrs of the building [and much closer to the boundary where 64,000 birds are free to roam, depositing tons of manure], 3 are directly downwind and 16 within 1km. They will be subject to toxic wind borne pollution, harmful bacteria, infectious diseases, viruses, odours, noise and light pollution and an increase in disease carrying flies and rodents

There is an 11% increased risk of developing community-acquired pneumonia within one kilometer  
Bird flu outbreaks increase every year, with more transmissions to humans in the past 15 yrs than in the entire 20th century

Local flooding is already a problem and will be increased

Local waterways will be polluted

The roads will not cope with the additional, heavy traffic

There is no benefit to the local community. The bulk of the feed will still be imported and at most only 2 staff are required. Waste will required to be shipped out

The construction and running of the IPU will have a significant carbon impact out of all proportion to the current land use.

The ammonia generated can break down to form nitrous oxide - 300 times more potent a greenhouse gas than CO2.

Supplying supermarkets is a volatile business and success is not guaranteed.

The consultation has been poorly run and objectors are not given sufficient time and space to properly present their case. The application contravenes and does not properly address the requirements of the Local Plan. It contains dubious, obscure methodology and uses language and phrases to downplay the adverse impact of the IPU.

**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** FAO Ruari Kelly. Case officer Angus council. Objection to: 21/00337/FULM  
**Date:** 08 June 2021 16:13:13

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Re: 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,

**please make this letter available to the whole Committee delegated the task of assessing this application, and accept my objection to the above planning application.**

My reasons are as follows:

### **1. Human health.**

#### **Pandemics**

Amid a pandemic that is killing people, scientists predict that the next pandemic will start as an *Avian Flu*.  
<https://www.cdc.gov/mmwr/volumes/66/wr/mm6635a2.htm>

There have been 25 outbreaks of Avian Flu in the UK since Nov. 2020.  
<https://www.gov.uk/guidance/avian-influenza-bird-flu>

Some 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/>

Many in the UK have grave concerns of factory farm-caused pandemics, because of animal overcrowding and unhygienic conditions.

It is irresponsible to apply for planning permission on this enormous scale. 64,000 genetically homogenous birds will be kept in high population densities. There is a known tendency for **low** pathogenic viral strains to mutate into **high** pathogenic strains amongst poultry flocks, with added potential for easy transmission to other mammals.

NB.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.

This email asks you therefore to view the proposed development as a **risk to human health, ongoing**.

Please heed the WHO: "...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>)

Also 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 amplify this point, listed UK diseases linked just to chickens (there are similar lists for other farmed species) include:

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

### **2. Antibiotic Resistance.**

#### **Drug overuse**

Antibiotic resistance is one of the biggest threats to global health, food security, and development today. It occurs

naturally, but, despite pleas from scientists, overprescribed antibiotics in humans, and those routinely fed to animals accelerate the process. ([www.who.int/news-room/fact-sheets/detail/antibiotic-resistance](http://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance))

- Intensive farming systems depend on drug use at high levels: farm animals consume one-third of all antibiotics in the UK
- Overcrowding and constant contact with faecal matter in intensive farming drives this problem.
- Drugs given to animals in their diets supposedly preempt the sicknesses caused by cramped, unsanitary conditions where infections spread fast.

**Intensively reared pigs and poultry account for 79 % of UK farming antibiotic use.**

The Soil Association ([www.soilassociation.org/reducing-antibiotics-in-farming/](http://www.soilassociation.org/reducing-antibiotics-in-farming/))

\* Antibiotic Resistant Bacteria persist in slurry produced by such farming. Along with other pathogens spread on fields, they become runoff into streams & rivers, polluting the entire food chain and making fresh water hazardous to every life form.

It is no longer acceptable for planners to prioritise factory farm permits over this dire misuse of natural resources.

### **3. Other environmental impacts.**

#### **Emissions.**

Present government regards Local Authorities as central to delivering its CO<sub>2</sub> emission targets.

Yet intensive farming applications go through planning departments across the UK. These professionals hold the key to recognition of significant impacts, from each and every factory farm.

The production of food from animal agriculture is a significant source of **emissions** in the UK, especially the production of greenhouse gases and the pollution of water sources.

For pigs and poultry, the main pollutants are ammonia and N<sub>2</sub>O.

Nitrous oxide (N<sub>2</sub>O) has 296 times the Global Warming Potential of CO<sub>2</sub>

and ammonia (NH<sub>3</sub>), contributes significantly to **acidification of rain and soils.**

The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH<sub>4</sub>, N<sub>2</sub>O and NH<sub>3</sub>, respectively (NAEI, 2007), nearly all of which is derived from livestock production.

[[Defra](#)]

The science was clear in 2007.

Planning applications for intensive livestock units should not receive approval. Ammonia and Nitrogen harms more than 60% of the UK's land area. It affects 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>)

Short-term benefits of employment and meat production are outweighed by the environmental impacts, both on the local area and far beyond. Remember, nobody has found a way of cleaning up this pollution after it's released. Prevention will be prudent, far more practical than endlessly attending to the damage and worldwide climate mitigation schemes.

Our diets have huge impacts on Earth, they can and do cause biodiversity loss, disease and pandemics.

Applications should be considered in line with our broader responsibilities to protect future generations. We already face a climate emergency.

### **4. Local impact and site-specific information**

Angus Council Website contains various statements to which councillors commit.

This type of development actively goes against them. [e.g. below]

**(A)** *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.*

**(B)** *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.*

**(C)** *We will seek to:*

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

**(D)** 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.

Documented discussions from the Angus Council Development Standards Committee 15 Sept also mention:

*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) & 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. The opposite is true, as this 2019 Defra report illustrates:

([https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/834432/evidence-compendium-26sep19.pdf](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”.

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.

As mentioned above, chicken farms of this size produce enormous & toxic amounts of faecal matter, to be deposited on the outdoor ranging areas or sprayed as slurry on fields and thence into the local watercourses and river habitats.

## **5. Global hunger.**

### **Disproportionate use of resources.**

Factory farming's impacts go beyond local environments to increase 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). High-protein animal feedstuffs are sourced on an industrial scale by **overfishing**, and by growing demanding crops, eg **maize** and **soya**. Factory farming's demand unnaturally depletes oceans, rainforests, fresh water and soil nutrients.

“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](#))

Plant based diets gain increasing favour with the public as people recognise that they have been eating to compromise their health, finding that meat consumption links to cancer and cardiovascular disease.

Vegans and vegetarians look set to make up a quarter of the UK population in 2025 and this part of the market is expected to increase to £658m by 2021.

Begging the question is another factory farm really appropriate for any farsighted community?

## **6. Animal suffering.**

### **a question of ethics**

This application for a factory farm does not represent current public opinion. In a recent survey 85% of the public were against Factory Farms.

Defra's 2019 report 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 lax, all of us know that it is morally wrong to subject sentient animals to the fear, illness and misery of 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 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, the committee's attention is dutifully drawn to recent Animal Aid investigations at another unit, which exposed disgusting and inhumane conditions: footage of hens with extensive feather loss, injured birds, dead and decomposing birds left among the living. The flock was extremely dirty with heavy dust and faeces accumulating.

Only a small percentage of birds range outside during the daytime; crowding and social hierarchy prevents all of them accessing doorways. Some hens may never range outside.

Two sheds are proposed for the purpose of accommodating 32,000 laying hens each, totalling 64,000 hen capacity at the site.

We question whether it is possible to monitor flock health and welfare generally, or to safeguard it in an emergency situation. Such huge scale, vertical farming with many thousands of hens, can never really constitute 'free-range'.

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

## **SUMMARY**

Future prospects are:

- More pandemics.
- Climate disruption.
- Environmental damage.
- Biodiversity loss.
- Global food poverty and UK food insecurity.
- Antibiotic resistance - antibiotics used to cram animals into unhygienic conditions & keep them alive until slaughter.
- Animal mutilations without anaesthetic and no chance of a normal life.

Science clearly shows that factory farming of animals is a leading cause of all the above.

With this in mind, I urge you to protect today's children from serious problems set to dominate their future unless those in power act now. Not just pandemics but the climate chaos, environmental anomalies, antibiotic resistance.....a horrifying picture.

**The climate crisis is here & ever greater 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

--

*Jane Eades*  
TR1 3RA



Email to: [planning@angus.gov.uk](mailto: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](http://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance))

The Soil Association says ([www.soilassociation.org/reducing-antibiotics-in-farming/](http://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 CO<sub>2</sub> 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 N<sub>2</sub>O. Nitrous oxide (N<sub>2</sub>O) has 296 times the Global Warming Potential of CO<sub>2</sub> and ammonia (NH<sub>3</sub>), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH<sub>4</sub>, N<sub>2</sub>O and NH<sub>3</sub>, 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 CO<sub>2</sub> 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](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

# 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 John McLean

Address: 6 Fordyce Terrace New Deer Turriff AB53 6WE

## Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I strongly support this application to invest in the local rural economy. This new state of the art high health unit will be a great asset to the local area, creating new jobs both on the unit itself and during its construction. The naturally produced manure from the unit will also reduce the need for imported artificial fertiliser on the farm, this is a great way to help reduce carbon emissions.

**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** FAO Ruari Kelly. Case officer Angus council.  
**Date:** 08 June 2021 07:27:39

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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 strongly object to the erection of additional structures not only for the reasons listed below but also because food waste in the UK is at an all time high and until we can better distribute and use food we should not be adding to the problem, especially in a way that damages people, the environment and animals in the ways explained below. I use a surplus food shop and last week 5,000 eggs were surplus to requirements which is disgraceful.

**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 \(www.gov.scot\)](#)

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**.

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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](https://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance))



The Soil Association says ([www.soilassociation.org/reducing-antibiotics-in-farming/](http://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 CO<sub>2</sub> 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 N<sub>2</sub>O. Nitrous oxide (N<sub>2</sub>O) has 296 times the Global Warming Potential of CO<sub>2</sub> and ammonia (NH<sub>3</sub>), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH<sub>4</sub>, N<sub>2</sub>O and NH<sub>3</sub>, 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 CO<sub>2</sub> 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](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-2dlbbNDhtW7rHr3RG2g>

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.
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- 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

Kathryn Melia  
Matthew Melia

# 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 Ken Graham

Address: 20 Thornton Gardens Arbroath DD11 3DX

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Strongly objecting to this planning application.

Reasons detailed below;

- 1/ Unsuitable access U467 is a lane - not an access road for a development of this magnitude.
- 2/ Smell and odour will be over whelming.
- 3/ Flooding from contaminated water seeping into surrounding soil; this area floods regularly, such a development will only increase this likelihood of this happening.
- 4/ Impact on surrounding wildlife.
- 5/ Animal welfare.

This application should be rejected in its entirety.

**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** Planning  
**Date:** 07 June 2021 21:11:47

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Dear planning committee,

I'm contacting you in order to highlight my objection of the planning of two 32,000 capacity free-range hen sheds and associated infrastructure

**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.**

**One of my main concerns that lead from this proposal is that of human health. Factory farms, particularly those of chickens, similar to this proposal have been linked to several illnesses found in the UK such as**

Campylobacteriosis

- Psittacosis
- Salmonellosis

**Not to mention all the other diseases and viruses that have been caused by animals, and the mass human consumption of animals. The current coronavirus along with the 2002-2003 SARS outbreak are just some examples of the connection between animal consumption and epidemics/pandemics. With factory farms often a breeding ground for bacteria, viruses, and generally unclean living conditions as highlighted in many documentaries such as this link I have attached here**

**Please could you take the time to watch this short video that highlights many of my concerns about cleanliness, human health, and animal welfare linked to your proposal.**

**<https://youtu.be/w6QmZF7VxBc>**

**I find it hard to understand why, during a pandemic caused by animal consumption from places very similar to factory farms, we should plan for a 32,000 capacity free range hen sheds?**

**Surely during such a time as this current pandemic we should be promoting human health, rather than propose more factory farms which scientists predict will cause more pandemics.**

**As a country we focus on HOW to overcome this current pandemic, but I fear we do not show enough interest in HOW it came about, and how to therefore avoid the next pandemic. It is clear from the way animal consumption, and unclean conditions such as those of factory farms can become a breeding facility for new infections and pandemics, therefore why are we still proposing more unhealthy, unclean factory farms? If such factory farms and mass animal consumption continue, it is only a matter of time before the next pandemic is upon us, and that of which could have been avoidable if we tackle the root of the problem, and reduce our reliance on facilities such as factory farming.**

**The future therefore doesn't look very good if we are to continue to promote and plan for further factory farms such as these proposed by you.**

**If such expansions of the factory farming industry are to go ahead we are to expect further impacts on**

**-human health**

**- more pandemics**

**-An even more severe climate crisis than there is currently**

**-Animal suffering and cruelty**

**-antibiotic resistance due to the usage of antibiotics on factory farms to keep animals in unclean unnatural conditions. This then causes antibiotic resistance within humans, which makes it hard to treat those illnesses normally treated by antibiotics**

**-A loss in biodiversity**

**-environmental and local impact**

**-Global food poverty**

**These are all problems caused by factory farming, and therefore with these in mind I ask you to consider the future of our planet, children, population, and general health , and reconsider your planning of this 32,000 hen shed.**


**I hope you will consider my reasons of OBJECTION which highlight the many concerns that rise from this proposal and the detrimental effect it will have on our future here in the UK and around the world as well as the future of further generations to come**

**The science is clear, Factory farming has a negative effect on all of the above and now it is time to act on the scientific knowledge and plead against this proposal**

**I therefore, along with many others strongly object to the above planning and ask you to reconsider the planning for the sake of our planet and children**

**Yours faithfully  
Medi Thomas**



**From:**   
**To:** [PLANNING](#)  
**Subject:** Objection to planning permission  
**Date:** 07 June 2021 22:12:25

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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 main reason is concerning **animal suffering**.

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-2dlbbNDhtW7rHr3RG2g>

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?

In today's society we look back at the way we discriminated against those different to us in horror. We enslaved those of different races to us and the patriarchy belittled those of the opposite gender. We reflect upon this history in horror and shame yet still continue to discriminate today, at the scale of billions, against those who are different to us- those of different species. Approving this planning permission would be feeding into and enabling this discriminatory framework in which we live in. When our children, in the future, look back at today's factory farms in disgust of the unethical act of subjecting sentient beings to unnecessary suffering, what side of history does the planning committee wish to be on?

I OBJECT strongly to this application on the above ground.

Yours faithfully,  
Niloo Gavahi

Sent from my iPhone

**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** 21/00337/FULM Objection  
**Date:** 07 June 2021 21:10:27

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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.

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**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>

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-

Some of these have been outbreaks in Scotland itself :

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-

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**.

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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)
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## **ANTIBIOTIC RESISTANCE**

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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".

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“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?

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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 CO<sub>2</sub> 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.

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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 CO<sub>2</sub> 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”  
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“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)

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## **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-2dlbbNDhtW7rHr3RG2g>

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**

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The future looks grim.

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- Environmental damage.
- Biodiversity loss.
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- 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

Peter Gray





**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** FAO Ruari Kelly. Case officer Angus council.  
**Date:** 07 June 2021 20:09:43

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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:**

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Some of these have been outbreaks in Scotland itself :

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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.

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

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Yours faithfully

Rachel O'Connell



# 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 Sarah Leaver

Address: No1 Farm Cottage West Mains of Gardyne Guthrie DD8 2SR

## Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: With reference to the above-mentioned planning application;

I would like to strongly object to these constructions for multiple reasons.

Primarily the Environmental Impact .....

This would include the pollution of noise as presumably there will be a requirement to run fans 24/7 for these free-range hens housed on site.

Light, again there may be light stimulant required, especially throughout the winter months.

Heat, to simulate egg laying and keep the chickens alive, again pivotal throughout the winter months.

Smell, undoubtedly there will be some sort of smell generated from this plant.

Pollution from waste, due to the sheer volume this will ultimately not only pollute the local streams but will infiltrate the surrounding areas soil.

As a member of the public, the location of the development would appear ludicrous - the access to site would be from a road which is challenging enough to drive in a car, there is a blind corner with limited passing points.

This presents high risk to not only vehicle traffic on the road but also pedestrians/dog walkers, cyclists, horse riders not forgetting the wildlife. As a horse owner and rider, living locally, I utilise these lanes on a daily basis. Appreciating the increased flow of traffic, likely heavy vehicle traffic, if this proposal was to be approved would without doubt be of huge concern.

I feel the detrimental bearing this 'proposal' will have on the surrounding area to be irreversible.

We have resided within close proximity of where the proposed chicken sheds are to be built, for 10 years. This is a tranquil area, as much as I appreciate farms and industries must evolve and embrace these challenging times, there must be a more logical area to locate not only these sheds but also the infrastructure to support such an industrious project.



**From:** [REDACTED]  
**To:** [PLANNING](#)  
**Subject:** Planning application objection  
**Date:** 08 June 2021 10:40:56

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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.

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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](http://www.who.int/news-room/fact-sheets/detail/antibiotic-resistance))

The Soil Association says ([www.soilassociation.org/reducing-antibiotics-in-farming/](http://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 CO<sub>2</sub> 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 N<sub>2</sub>O. Nitrous oxide (N<sub>2</sub>O) has 296 times the Global Warming Potential of CO<sub>2</sub> and ammonia (NH<sub>3</sub>), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH<sub>4</sub>, N<sub>2</sub>O and NH<sub>3</sub>, 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>)

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 CO<sub>2</sub> 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](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-2dlbbNDhtW7rHr3RG2g>

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