

Subject: Application Number: 21/00602/FULM - Comment from Inversity Community Council

I am writing to you as Chair of Inverarity Community Council. The Community Council would like to submit the letter below as a comment on planning application 21/00602/FULM. Normally we would submit documents like this through our Community Council email address but we believe that the deadline is tomorrow and our secretary is currently away. I have therefore copied the Community Council email address.

I would be grateful if you could acknowledge receipt. Many thanks.

Kind regards Elizabeth

Application Number: 21/00602/FULM

Address: Land West of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including

feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping

At the meeting of our Community Council on 15 September 2021 we were joined by members of our community who are concerned about the above planning application and they have asked if we as a Community Council can offer assistance in any way. As it is our role to reflect the views of and act as the local voice for our community so that you as a Council are well informed on local opinion before decisions are made, we would like to inform you of some of their concerns. We understand that they have already objected as individuals to your Department. They presented their objections to the proposed project and below are some of their strongly felt concerns based on the immediate impact on their lives and environment.

Negative effects on the amenity of residents and proximity of project to residential properties The proposed sheds are of a very large size and will be located very close to existing housing. Residents are extremely concerned, not just about outlook, but also about noise, airborne pollution, traffic, vermin and smell.

Degrading Angus countryside and affecting tourism

The buildings will be visible for many miles around and will change the character of the landscape. They are not characteristic farm buildings and are instead more like industrial factory units, which are to be placed into a traditional farming landscape. There is great concern that the buildings are not more sensitive to the Angus landscape. There is general distrust and upset at the way that the photomontages have been produced.

Change of land use

The land is currently class 2 agricultural land and is therefore high quality, productive ground. There is a view that these proposed sheds and the associated forage areas would be a misuse of this prime agricultural land. There is concern that the land which is proposed to be used for these units and the forage is too large for it to be a "small-scale development directly linked to a rural business".

Traffic Hazard

Extra lorries would need to use the small local roads to access the site. These roads are narrow (one-lane in places) and this will have a negative effect on those using them, including walkers and cyclists. The roads are not designed for heavy traffic and so verges and road condition will be damaged. This will lead to roads being less safe for local people and needing higher maintenance using Angus council funds.

Environmental pollution and impact on local ecology

Concerns have been raised about the water table around the site. It is currently high and residents are concerned that heavy rain would lead to flooding washing through the proposed site and filtration plant, taking polluting chemicals from the proposed site into the local waterways without being filtered.

Risks to the health and wellbeing of local residents, farmworkers and youth groups Local residents are concerned about the potential effects of airborne particulates, including ammonia, both on their own health and of that of farmworkers and organisations like the Girl Guides who use local facilities.

Thank you for considering this letter.

Yours sincerely Inverarity Community Council

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds, feed silos, egg packaging facility,

vehicular access, access tracks, drainage, landscaping and associated works.

Case Officer: Ed Taylor

Customer Details

Name: Mrs Jane Brown

Address: Easter Meathie Bungalow Forfar

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons: Comment:Dear Sir.

Erection of two 32,000 capacity free-range hen sheds, feed silos, egg packaging facility, vehicular access, access tracks, drainage, landscaping and associated works.

I wish to object to the planning application made by Craignathro Farms for two, 32,000 hen industrial sheds to land west of Easter Meathie Farm Bungalow Forfar.

The prime land in this proposed development is grade 2, which is very good quality arable land. It is a complete misuse of prime arable land.

My property sits directly towards the proposed development. The applicant wishes to build on the open landscape bordered to the north and south by hills with direct unscreened views.

There are no fences, stone dykes, or trees to reduce the visual impact. Any potential screening from the range will take years to be effective.

Extensive evacuations to raise and level the site, the foundation and approach access, will all be raised above the current land form making it particularly prominent and visible from my property. My property is directly downwind of the units, any emissions, or odours from manure extraction, handling and transfer will affect my property.

I already experience the odour from Craignathro from hen manure stored in their fields and also during spreading. This will increase.

There is only one access road which we would share with the unit. The road is narrow with grass verges on both sides. ALL construction and operational traffic will pass in front of my house and may at times impede exit and entry. I will be directly affected by all noise. This proposed application will make this area a less attractive and desirable place to live and visit. It will degrade the experience of walkers, runners and cyclists. It will have a negative impact on the experience at Ladenford Den Guide Camp.

As explained above, this proposed planning application would impact my quality of living at Easter Meathie. I urge you to reject this planning application.

Yours faithfully, Jane Brown

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Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Miss Alex Hughes

Address: 37 Earl Matthew Avenue Arbroath DD115JU

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: It is cruel and appalling to cram 32,000 hens into a shed where their movement will be restricted and their quality of life will be extremely poor. This cannot be considered as free-range.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Wendy Murray

Address: Rockville Easthaven Carnoustie DD7 6LQ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The Angus Local Development Plan Policy (PV20 Soils and Geodiversity) states development proposals on prime agricultural land will only be supported where they are of a small scale and support delivery of the development strategy and policies in the local plan. This is a massive industrial development which in my view could have catastrophic environmental and health impacts. Cogeo on behalf of Craignathro Eggs have provided over 50 documents in support of their application. Within these, they aim to persuade Planners that the intensive rearing of 64,000 poultry in two sheds constitutes 'free range'. In addition, the impact studies conclude that there is no risk to human health, air quality or to the environment. I hope that Angus Council Planners are given the time and resources to undertake a careful analysis of these documents and an independent review of the evidence. This development is not about sustainable farming and with concerns of an impending Avian Flu pandemic the impacts could be devastating.

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Ms Suzan Nicoll

Address: 17 Tayside Street Carnoustie Angus

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I am writing to object to the proposed building of a facility which is to house 64,000 hens which is being described as free-range. The plans do show an area where during the day the hens may have space. However the living quarters for these hens is unacceptably small. If this is to go ahead, which I hope it doesn't as the welfare of these hens will be seriously compromised in this living space, it cannot be allowed to claim free-range status. This interior space is in essence a factory.

On a more environmental note, with so many animals contained in such a small area, there will be associated smells. How can owners ensure that the smells from this animal factory will not detrimentally affect the local area, even with the mitigations they propose?

It is imperative that the welfare of these animals is considered as part of this application and that the correct description of their conditions is used, which is not what the general public would consider 'free-range'.

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Case Officer: Ruari Kelly

Customer Details

Name: Carly Brogan

Address: 17 Brown St Blairgowrie PH10 6EX

Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This should never be allowed.

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Case Officer: Ruari Kelly

Customer Details

Name: Ms Surindar Mann

Address: 4 Eastfield Farm Cottages Auchterhouse DD3 0QP

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:If Angus Council approves industrial scale egg production at Cononsyth and Easter Meathie, it sets a dangerous precedent for Scotland and reverses the progress made on hen welfare after many years of animal welfare campaigning. A hen house containing 32,000 hens is not and never will be 'Free Range'. The hens will be living in extremely stressful and unhealthy conditions, which wil probably lead to overuse of antibiotics and other drugs, none of which are good for consumers or the hens themselves. This is cruel and unnecessary. I keep hens and they each have personalities, preferences and emotions. If the moral argument doesn't appeal, then consider the impact of avian flu at this scale. Please throw out this application.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Michael Scott

Address: Howden Haddington EH414JS

Comment Details

Commenter Type: Miscellaneous

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I have watched the Steel family grow and innovative their business over the past ten years. It continues to provide food, employment and education to the local community.

This family business has invested in the local economy both directly and indirectly. They have continued to safely provide employment and work for contractors during the Covid 19 pandemic and beyond, while adhering to government guidelines.

This is the type of business that is essential for the survival of the economy and community within Angus, now more than ever.

We wish them every success in the future growth of their business.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Richard Buchan

Address: Newquip Leeming Bar DL7 9EE

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:
Comment:Dear Mr Kelly

I am writing in support for this application.

The new unit proposed for the land west of Easter Meathie is to cater for the ever increasing public demand for Free Range Eggs. Approving this application will help ensure our food is produced locally, jobs are generated locally and investment is made locally.

We have been suppliers to this farmer for quite some time and can confirm they insist on the best, most modern equipment for their hens with absolutely no compromise on the specifications, ensuring they are giving their birds the highest welfare facilities possible.

The laying houses are internally divided to give defined spaces for small flocks, each with their own feed, water, multi-level perchery, nesting areas and fresh air ventilation system as well as their own dedicated outdoor ranging areas, all in full compliance with The RSPCA Assured regulations and accreditation.

These standards are recognised worldwide as being among the highest.

Producing our food locally, employing local people and boosting the local economy. Surely more desirable than importing our food?

Please approve this application.

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Jane Brown

Address: Easter Meathie Bungalow Forfar DD8 2LF

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Dear Sir/Madam,

I object to the planning application made by Craignathro Eggs. I would be directly affected by this proposal.

Building industrial hen sheds to accommodate 64,000 laying hens would destroy the open farmland & natural landscape of Easter Meathie Farm. It is a highly productive arable farm with traditional farm buildings in keeping with the heritage & rural environment. The proposed application would mean building on Class 2 prime arable land. The land is productive & this would be a misuse of of quality arable land.

The visual impact would be tremendous. My outlook would change immeasurably.

There would be significant smell & noise pollution. 64,000 hens would create vast amounts of waste - which would need to be removed, stored & potentially spread on the land. Ammonia from hen manure is extremely pungent & this would lead to reduced air quality. The smell would affect me directly. There would be noise from the ventilator system which would operate continuously. Furthermore, hens, a feed store & the waste produced would attract flies & vermin.

I have environmental concerns regarding pollution to the water course, with water flowing into the Spittal Burn & onwards to the Dean Water. This land is also at risk of flooding.

An independent report for the 'British Free Range Egg Producers Association', published in the

'The Courier & Advertiser' newspaper on 10.10.2020, has warned against expansion of this sector. If this market continues to expand, this will lead to an over-supply & reduced profit for farmers.

As Craignathro Eggs has already has 32,000 laying hens at Craignathro Farm, is expansion necessary? What would happen to the infrastructure if egg production becomes unprofitable & unsustainable?

Finally, the local access roads & farm road, in particular, cannot withstand the volume & weight of lorries constantly moving in & out of Easter Meathie Farm.

Thank you for considering my objection to this proposal.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Alan Miller

Address: Burnside Wester Tillyrie Milnathort, Kinross KY130RW

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Although I am a resident of Milnathort, Kinross rather than of Forfar, I am nevertheless concerned to learn about any inappropriate development which could desecrate our beautiful Scottish Countryside. With friends and family living in the Forfar area and more particularly in Easter Meathie, I am a frequent visitor to the area and am seriously concerned at the prospect of two hen sheds accommodating 64000 hens being granted Planning Consent.

My first concern relates to the smell which from experience can drift several miles from the site of the hen shed depending on wind direction. Despite claims from the operators of these sheds that they can keep the odour under control, this is not always the case.

Secondly the development is industrial in nature which will have a detrimental visual impact on this particularly attractive area of rural Angus and the proposed buildings do not sit well with the existing more traditional farm buildings. The area is much loved and appreciated by walkers, cyclists and countryside lovers in general and this proposal will take away a considerable amount of its appeal not only for them but for the neighbours who will have to live with the consequences on a day to day basis. Allowing these sheds to be built will create pollution in all its forms to air quality, noise and light.

I would therefore like to object in the strongest possible terms to this Planning Application which would appear to contradict the Angus Local Development Plan which requires such proposals to be of a scale and nature appropriate to their location. In addition I feel the Council also has an obligation to ensure its own commitments to protecting and enhancing the quality of the landscape, maintaining and improving environmental quality and protecting and enhancing open spaces, are all met. Granting Consent for this development would be a clear failure of policy enforcement.

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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: My objections to this proposal are as follows:

- This proposal is in a particularly scenic corner of rural Angus. The site is in an exposed position set against the disincentive backdrop of Fothringham Hill and Hill of Lour and will be highly visible. It will be out of character, adversely impacting on scenic southerly views from the Forfar Path Network and will become the central dominating feature
- The development is industrial in nature and does not fit with the existing traditional clusters of farm buildings. The development site will remove 113 acres of prime agricultural land from cultivation and will be of little economic benefit to our community
- The tripling of the concentration of such units within a small rural area is a development of inappropriate scale and at odds with its local character
- The need to level the site, along with the stripping back of the grass by foraging hens around the buildings, will only add to the adverse visual impact
- The site presents considerable drainage challenges requiring complex drainage and foul water measures which cannot be relied on to prevent foul water run-off and pollution in an area which is known to flood
- -The development will introduce harmful particulate pollution, foul odours, noise and light pollution into the local area to the detriment of residents

- It will place an unacceptable burden on the residential amenity of the properties at East and West Meathie, Lochlands Park, on Mosside Road and at Ladenford, whilst the small, local roads are not designed for the increase in heavy vehicle traffic
- This proposal is contrary to the Angus Local Development Plan policies DS1, DS4, PV2,PV4, PV6, PV12, PV14, PV20

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr William Robertson

Address: Canmore farmhouse Forfar DD8 1XG

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to the proposed planning application on the following grounds:

- 1. The facility will detract from the beauty of the countryside.
- 2. The increase in hazard created by additional heavy goods vehicles on a road which is already unsuitable for the present traffic.
- 3. The health risk created by such a large facility due to pollution of the ground and therefore run off into the local waterways.
- 4. The disposal of the waste associated with such a facility. Waste from the present facility is dumped in the fields and left to pollute the atmosphere for months before being spread and dug into the ground.
- 5. The road to the north of the facility is a popular walking route for Forfar residents which will be marred by the construction of such a facility not least the smell from the waste created.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Fiona Colville

Address: 1 Dalrymple Crescent Musselburgh EH21 6DT

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I visit this area fairly often to visit family and am appalled at the plan to erect hen sheds for 64,000 hens. This intensive poultry unit means the removal of 113 acres of valuable agricultural land - which at present is a beautiful part of Angus - and I question how this would actually benefit the community economically. This area is very rural, which makes it a joy to visit, and another negative aspect is the increase in vehicular traffic on country roads that were never designed to deal with heavy traffic. Surely this means there will be road safety issues too? The potential noise and smell is another issue, and so I strongly oppose this proposal.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Martin McKay

Address: 12 Angle Park Crescent Kirriemuir DD8 4TJ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I object to this development as I do not think the proposal is good use of prime agricultural land. Having experienced living near a similar development I find the smell emanating from these 'chicken sheds' to be particularly noxious. This particular development would detract from the natural beauty of the Angus countryside at a time when we should be trying to attract visitors and prospective residents to the area.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr G Stewart Watt

Address: Rose Cottage Caldhame Forfar DD8 2LG

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This development would be completely out of proportion to the existing buildings and inappropriate in the surrounding landscape at the proposed site. It would be built on prime arable farmland, some of Scotland's best, which has been productively farmed for centuries, in a rural landscape visible from the A90, one of Angus's 'ambassador routes'.

Very close proximity to three houses would inevitably expose residents to 'bad neighbour' intrusions in the form of hugely increased heavy lorry traffic on a single lane private access road and associated odour, noise and pest infestation.

Increased lorry traffic would affect drivers on the Canmore Straight, a route used by much of the south Forfar, Kingsmuir and Kirriemuir areas to access the A90 and which itself permits only single lane traffic at points. The road surface and verges are already frequently in poor condition.

Further concerns relate to the high water table at the area of proposed building. Currently a groundwater pump is constantly in use because of the high water table and the volume of rainwater shed from Fothringham Hill and Hill of Lour. Given forecasts of future more extreme weather conditions it is foreseeable that notwithstanding reed bed processing, flooding through the facility would mean nitrogen and other pollutants being flushed unfiltered into the Kerbet Burn and from there westwards towards major rivers.

A comparable facility was developed close to Craignathro Farm within the last few years and it is clear from that example that sensitive siting of this kind of development can successfully avoid negative intrusion into the local lives and landscapes. The proposed site does not match that level



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Case Officer: Ruari Kelly

Customer Details

Name: Ms Lisa Mortimer

Address: Whitehills Northmuir, Kirriemuir DD8 4PU

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I object to these sheds being erected, as the sheds will produce air borne pollution, and create noise and light pollution as well as noxious smells.

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Case Officer: Ruari Kelly

Customer Details

Name: Roy Macdonald

Address: East most cottage Canmore lour Forfar DD8 1XG

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:That roads surrounding the proposed site are totally incapable of withstanding the extra heavy loads and are already crumbling with traffic from the current agricultural traffic. The extra water and other associated pollution to the surrounding waterways is not acceptable not to mention the air pollution that we already have to suffer from the current waste that is deposited on the surrounding fields from the craignathro site.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Kathleen Espie

Address: 1a Durham Drive City of Edinburgh EH15 1PG

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I object to the proposed development which is at odds with the rural character of the

area.

From: 19 September 2021 10:51

To:

Subject: 21/00602/FULM Objection



Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar



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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** 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. <a href="https://www.gov.uk/government/publications/list-of-zoonotic-diseases

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

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

ANTIBIOTIC RESISTANCE

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

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

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

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

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

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

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

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

ENVIRONMENTAL IMPACT

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

Furthermore, the Government sees Local Authorities as central to delivering its CO_2 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=1466 <u>2</u>)

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)

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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".

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

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There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

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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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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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- 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. Need more proof – please read the research highlighted in this booklet.

https://78460747.flowpaper.com/FactoryFarmingisharminganimalspeopleandtheplanet/

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

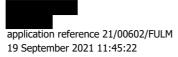


Chicken factory name. Closing date 24th September. Emails or letters must always include the application reference 21/00602/FULM and state clearly that you object.

Date: 19 September 2021 11:39:08

Please do not allow this to go ahead. Do the right thing please. Yours sincerely Patricia Daykin





To Whom it May Concern:-

Objection: 21/00602/FULM

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.

Please read the list of UK Government zoonotic diseases. https://www.gov.uk/government/publications/list-of-zoonotic-diseases/list-of-zoonotic-diseases

Diseases linked to chickens alone include Avian Flu, Campylobacteriosis, Psittacosis and Salmonellosis, and on that basis I strongly object to the proposal for the chicken factory farm and urge you to vote against it.

Yours sincerely

Susan Eckholdt
The Old Appleyard
Bridgham
Norwich
NR16 2RS



Objection to: 21/00602/FULM 19 September 2021 12:07:18

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 based on the following reasons:

HUMAN HEALTH:

PANDEMICS

We are in the middle of a pandemic. 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 28 outbreaks of Avian Flu in the UK. https://www.gov.uk/guidance/avian-influenza-bird-flu

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, the capacity of this application will be a staggering 64,000 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
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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)

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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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I OBJECT strongly to this application on the above grounds.

Yours faithfully

Kathryn Magee





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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Yours sincerely

Michael Parker Moncrieff Barn RH20 2BP





Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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My reasons are as follows:

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Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to reenergise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

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- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate
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I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds. A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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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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 hens each, totalling 64,000. 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.

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

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The future looks grim.

- More pandemics.
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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 very strongly to this application on the above grounds.

Yours faithfully

Ms Jane V Roberts

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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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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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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, the capacity of this application will be a staggering **64,000** 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.

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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.

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I OBJECT strongly to this application on the above grounds.

Yours faithfully





application reference 21/00602/FULM

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Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

Please make a copy of this letter available to the whole Committee delegated the task of assessing this application.

Dear Ruari and the Planning Committee,

Please accept my objection to the above planning application for the following reasons.

After the experience of Covid and all the death and suffering it has caused, it is wise to remember that Scientists have predicted that the next pandemic will start as an Avian Flu.

The overcrowding and unhygienic conditions in Factory farming could well become the cause of the next pandemic, so why would a planning application for another Intensive factory farm even be considered.

Another major threat to global health is antibiotic resistance, and If no action is taken drug-resistant diseases could cause 10 million deaths each year by 2050. A third of all antibiotics in the UK are used on farm animals, particularly factory farmed animals. They are given automatically as a preventative measure as the animals are kept in unsanitary cramped conditions which cause infections which are quickly spread.

The production of food from animal agriculture is a significant source of emissions in the UK and pollution of water sources. 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?

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

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.

A large majority of the public are against Factory Farms, so this application is against public opinion. Plant based diets are gaining favour as people recognise that they have been eating diets that are poor for their health. Meat consumption increases the chance of getting cancer

and heart disease. With vegetarian and vegan product sales increasing daily, why do we need another factory farm?

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Tony Pullen







I strongly object to yet another cruel establishment APPLICATION ref $21/00602/\,FULM$ being built.

M Stoneman



21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure -

Objection

Date:

19 September 2021 14:41:51



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Please accept my objection to the above planning application.

My reasons are as follows:

I object to intensive farming being practiced anywhere in the UK: in my back yard and in your back yard. The poultry densities proposed are inhumane and morally indefensible. Further reasons for my objection are listed in detail below.

HUMAN HEALTH:

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It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing

sites not listed here.

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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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

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SUMMARY

The future looks grim.

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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 Raymond Hill 27 Lords Close Giggleswick North Yorkshire BD240EG

Objection to:

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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

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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?

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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)

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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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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."

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Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

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I OBJECT strongly to this application on the above grounds.

Yours faithfully Chantelle Ginn





Dear Planning Committee,

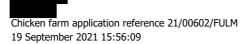
I would like to register my objection to this mega-sized chicken farm, free range or not, on the grounds that animal welfare cannot possibly be guaranteed on such a large facility, and pollution of the surrounding areas is bound to ensue.

It is a massive risk to consider introducing an industrial chicken farm on such an enormous scale, the capacity of this application will be a staggering **64,000** 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.

Yours sincerely, Rose Bunker

38 Twyford Road, Brighton BN1 9GN.





Myself and my family do not want this chicken farm built, as so many of our neighbours have become ill from these awful chicken factory farms, from the smells that come out of them . Then the awful conditions they are kept in.

We totally reject this planning proposal.

And hope you take note of this.

Yours sincerely Mrs Horseman



application reference 21/00602/FULM.

Dear Sir My family and I ask you to refuse planning permission for this factory farm which would mean thousands of birds leading short cruel unnatural lives in the name of profit.

Conditions on these farms are disgusting and inhumane.

When many food producers are listening to the public who cry out for more humane treatment of the creatures that supply our food this application goes entirely against the modern trend when customers are looking for free range well, kindly reared animals in all avenues of farm animal production and this includes birds who tend to be ignored even though the lives they live in this sort of rearing is totally against the natural behaviour they would enjoy in better rearing conditions.

Yours Sincerely Yvonne Birchall





I am totally oppused totis disgusting factory farm. maggie curati



Objection to application reference 21/00602/FULM 19 September 2021 19:47:32

I am writing to you to object to the following planning application:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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:

1. It seems to me 32,000 chickens in sheds is nothing other than a factory farm. This is despite the declaration of a free-range label. I believe there is no legal definition of how much outside space is needed to use the term 'free-range' which makes a bit of a mockery of the concept. Like many members of the public, I have significant concerns about intensive farming for animal welfare reasons. I'm also aware male chicks are culled after hatching in the egg industry as they are considered 'waste'. This accounts for 30 to 40 million chicks a year in the UK from statistics quoted in 2015, here.

and

2. Climate change: the Scottish government has ambitious plans to reduce emissions by 70% by 2030 - less than 9 years from now. The egg industry is a source of emissions and from a paper that can be accessed here: "Greenhouse gas emissions averaged a global warming potential of 2.2 kg of CO2e/dozen eggs". This is higher than directly consuming food from plants of the equivalent calories (see Our World in Data). Further, that same paper reports how the egg industry is heavily dependent on feed consisting of soy and cereals which is undoubtedly imported and uses a significant amount of industrial nitrogen to produce: nitrous oxide is a potent greenhouse gas. Not to mention the deforestation feed crops for animal farming causes in the Amazon, as widely reported. Closer to home, chicken farming is responsible for a significant amount of water pollution as can be seen in this article among others: Britain's riversare suffocating to death | George Monbiot | The Guardian.

and

3. Human health: not only have we suffered a global pandemic brought about by the way we treat animals, there is the ever larger and lurking catastrophe of antibiotic resistance. To quote

The Soil Association: "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.." A research article, <u>found here</u>, from Therapeutic Advances in Drug Safety noted: "Increased antimicrobial resistance is the cause of severe infections, complications, longer hospital stays and increased mortality." This is one of many research articles on this subject and should be a cause of concern to us all.

I'm concerned about the future of humanity. The Scottish Government appears to be making strong statements on climate change, but only their actions shall be judged in history - should we have long enough to judge it. Allowing another intensive farm seems contradictory to these statements - if anything, we should be winding these places up and drastically reducing their numbers. They are an abomination for so many reasons.

Therefore, I strongly object to this planning proposal.

Yours faithfully,

Sarah Roberts

Canterbury, Kent





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My reasons are as follows:

Overview

This proposition is inhumane, bad for the planet, our health, the animals and encourages pandemics. For God's sake, we need to change to a plant based diet. Do not let this abomination go ahead.

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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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.

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Comments for Planning Application 21/00602/FULM

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Valerie McMillan

Address: Summerhill Cottage Guthrie Forfar DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I would like to object to this planning application for the following reasons:

I feel there are far too many of these intensive poultry units being applied for, or already in operation in the area.

These units are both noisy and more importantly a risk to the health and well being of residents in the area. There are many pollutants which are released into the atmosphere during operation, also the aroma caused from them is both obnoxious and repugnant.

I ask, why ruin our lovely countryside with these large industrial units, when the reason for deciding to live in this area would be to reside in a peaceful tranquil setting.

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Customer Details

Name: Mr STEWART MACKAY

Address: Moss Cottage FORFAR DD82LE

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I live near the site of the hen shed at Craignathro Farm. I have been shown inside the premises and have seen the areas where the hens can nest in multi-level perches. They are able to go outside and often see the surrounding field full of hens. It is important to produce food locally while helping the local employment and economy which is what is happening at Craignathro Farm.





would ask you to please scrap this application for a factory farm. The cruelty is unimaginable

Yours Kathy Harrop



Ref: 2100602FULM

19 September 2021 13:20:04

Dear Committee.

After reading the case against allowing a 32,000 free range intensive unit with the above reference I strongly agree it should not be allowed planning permission. Time and time again similar units prove they become a den of disease and filth both for the birds and the humans who "care" for them. Since 2020 28 cases of avian influenza have been reported in humans and scientists have warned a pandemic is likely to be sourced at one of these outrageous highly stocked units.

Free range sounds ideal, but only a proportion of the birds will go out, the rest, at the lower end of the pecking order, won't, because they would be bullied and too frightened to push their way through.

Chicks are dirty birds and would soon contaminate their environment both inside and out. The ammonia levels are a health hazard to all , need I say more?

Small sheds with plenty of space with no more than a hundred hens, access to allow happy hens to thrive and lay good eggs, is environmentally friendly. The intensive system should be banned to the history books. Those of us who care for the planet must make our voices heard and those who have the power should be brave enough to say a resounding NO to destructive intensive farming.

Yours sincerely Marjorie Embling 20 Brookside Avenue Crook DL15 8LB

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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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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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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, the capacity of this application will be a staggering **64,000** 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)

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

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

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

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

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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 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."

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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 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)

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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".

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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)

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

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

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

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

ENVIRONMENTAL IMPACT

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

Furthermore, the Government sees Local Authorities as central to delivering its ${\rm CO_2}$ 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."

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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)

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".

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

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- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
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I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

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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 <u>doubled</u> 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?yeo7ISh7cMOXA&list=UUQU-2dlbbNDhtW7rHr3RG2g

Two sheds are proposed for the purpose of accommodating 32,000 hens each, totalling 64,000. 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.

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?

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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.

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I OBJECT strongl	w to this a	nnlication on	the ahove	grainds
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Yours faithfully

Rachel





Dear Sirs

I wish to object to the above application on environmental and human health grounds.

There appear to be properties within a sort distance of this proposal and these buildings will impact them very negatively. There are also other units of this nature in this area.

The environmental impact of these factory farms cannot be underestimated and we really need to be thinking about sustainable plant based alternatives very very soon to combat climate change.

I am also concerned about the animal cruelty involved in these types of 'farms' I know you do not take this into consideration but the suffering of animals on factory farms is a disgrace.

Please refuse this application.

Jane Smith







Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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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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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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?y=O7ISh7cMOXA&list=UUOU-2dIbbNDhtW7rHr3RG2g

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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

Jane Marsh





20 September 2021 09:54:46

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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.

It seems ludicrous that we are even considering a proposal such as this in the midst of a pandemic that has claimed the lives of millions of people globally. Three out of every four new and emerging diseases in people, including Covid 19, come from animals. Animal farming is the perfect breeding ground for these diseases. We are only one mutation away from another pandemic that is likely to be far more deadly than the current one. According to DEFRA, there have been 28 separate outbreaks of avian influenza in the UK since last November, and there are currently still many sites that are contaminated.

Antibiotic resistance is another major cause for concern. A third of antibiotics used in the UK are routinely given to farmed animals. This recklessness will inevitably lead to a pandemic of its own, whereby simple infections in humans that currently cause little concern, will become deadly.

On top of this, the world is facing a climate and ecological catastrophe, and animal agriculture is one of the leading causes. For this reason alone, nationally and locally we should be transitioning to a 100% plant based system of food production.

Pig and chicken farms are particularly responsible for producing toxic chemicals such as ammonia that contribute significantly to biodiversity loss, and the highly potent greenhouse gas, nitrous oxide.

It is puzzling that local authorities are being urged by central government to play their part in reducing the nation's greenhouse gas emissions, yet applications such as this one are still being considered. The Government's own advisers have said that, as a country, we need to reduce our consumption of animal products by almost half. How does this application for a chicken farm fit in with the Government's national carbon reduction policy?

Dealing with global hunger might be an issue that seems beyond the Council's jurisdiction, but it is a well documented fact that animals in agriculture are responsible for consuming huge quantities of food (often from ex-Amazon rainforest land) to produce very little in return just so people in affluent countries can satisfy their palate pleasure. In doing so, people in less fortunate parts of the world are left to starve.

My final point relates to the conditions that these timid little animals will be kept in. It is a fact that chickens value life as much as dogs, they possess a full range of emotions and

have the capacity to suffer as much as dogs do. Chickens are routinely mutilated and kept in vile conditions, even in a so-called 'free range' situation. So please ask yourself the following question: would you be happy for dogs, perhaps your own pet dog, to be kept in circumstances such as this?

For the above reasons I urge you to find any grounds possible to reject this planning application.

Yours faithfully

Pete Richards 1 Barley Way Horncastle LN9 5SS





Dear Planning Team,

I hereby object to this planning application.

To allow this proposal would be very irresponsible in terms of climate change and environmental impact, and in the midst of a declared climate crisis.

Governments and Councils as well as consumers need to make significant changes relating to food production and consumption, transitioning from meat, dairy and fish to organic arable farming.

Scientists and health professionals are calling for that change, for our health as well as for the health of the planet. See

- Scientists want EU to promote less meat and healthier diets June
 2021: https://www.ciwf.eu/news/2021/06/scientists-including-dr-jane-goodall-call-for-eu-to-promote-healthier-diets-not-animal-products?
 utm_campaign=politics&utm_source=email-enews&utm_medium=email
- The UK Health Alliance on Climate Change, which includes 10 Royal Colleges of Medicine & Nursing, the BMA, and the Lancet, calls for action to control meat and dairy for health and the environment: <u>UK Health Alliance on Climate Change</u>

Also, keeping chickens as proposed is a recipe for the next pandemic. And the welfare of the chickens will suffer from such unnatural conditions. If these reasons don't fall within what are acceptable objections, then the criteria should change, because these are all extremely important reasons. Please reject this proposal.

Yours sincerely, Virginia Bell, Catholic Climate Activist, 2 Dodkin, Beanhill, Milton Keynes MK6 4LP

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

I Deborah Cannon wish to make it very plain and clear that I am objecting to the plan for a chicken facility being built. Apart from the animal's welfare, there are risks to human health and further pandemics to name just 3 very real and very valid reasons.

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.

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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?

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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)

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

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

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

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

ENVIRONMENTAL IMPACT

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

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

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

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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 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)

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

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The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
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- Protected and Valued: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds. A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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.

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The science is clear. Factory farming of animals is a leading cause of all the above. Need more proof – please read the research highlighted in this booklet.

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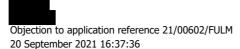
With this in mind, I write to ask you to protect today's children, from serious problems that will dominate their future if we do not act now. Not just pandemics but the climate crisis, environmental problems, antibiotic resistance...... it paints a horrifying picture.

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





Hello

Please find my objection to the above proposal. I am not a local but I am involved in fighting a proposal on my doorstep so I know rather more than I wish to about these industrial units. Do we really need another of these poultry units when more supermarkets are stating they will not buy meat from them and increasingly the public are waking up to the dangers e.g. River Wye in Herefordshire?

These are some of the reasons why I object:

Environmental Impact - Ammonia and nitrogen pollution

This proposal goes against the vision and outcomes stated in the Angus development plan Human health - risk of pandemics with so many birds in cramped conditions. Over use of antibiotics which is a huge threat to our health.

Low quality food and poor animal welfare.

I ask for those that vote on this development to properly address all these issues so they know what they are voting for. Thank you.

Regards Vicki Bale









Dear Sir or Madam,

I am writing in response to the application of Craignathro Eggs Ltd for the construction of two large hen houses. I would like to strongly object to the application in question. My family farm the neighbouring estate at Lour and the recent addition of just one hen shed at the site in question has damaged the local area considerably and the proposal for subsequent ones must not be approved if further damage is to be avoided.

The site is an extremely prominent and visible one from many parts of the surrounding area due to its position on the hill, this makes the development a potential visual stain for a large number of people in the area. It is at direct odds with the existing, traditional farm buildings in the area and the introduction of such an industrial plot will spoil the environment and landscape for those who live and work here.

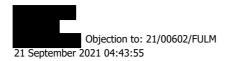
One of my greatest concerns is the smell that these chicken sheds produce, this concern has been justified following the erection of the initial shed. We are directly downwind of this site, we are not the only ones affected by any means, and the spreading of chicken manure entirely spoils the outdoors of the affected area. It is unlike other animal manure and the ammonia it contains leaves a very sharp odour in the air which frankly is extremely unpleasant (and a well known controversy in areas where hen houses have been built).

In the current push for sustainability and care for the environment it is surely a backwards step for an area like ours to be tolerating such disregard for the countryside and its inhabitants. We should take pride in maintaining and improving the landscape and its features, man made or not, and this proposal is in stark contradiction to that mentality. Future generations will not thank us for leaving the area in a worse state than when we found it.

Yours sincerely,

Thomas Smith





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.

Our rivers are being turned into sewage channels by chicken farms. The future of the human race is threatened by climate change to which animal agriculture is the biggest contributor. I ask the Authority to take its responsibilities to protect the environment and combat climate change seriously.

Please reject the application.

Yours sincerely

Jacob Sanders 13 Ferndale Close Cinderford England GL14 2QW

Lour Forfar Angus DD8 2LR

The Planning Department Angus Council Angus House Orchardbank Business Park Forfar DD8 IAN

20 September 2021

Reference: 21/00602/FULM.

Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure.

Dear Sir or Madam.

I am the owner of the neighbouring Lour Estate which has been in the care of my family for I4 generations. I have known Lour my whole life and have farmed there myself for 32 years. I take a special interest in the appearance of the whole estate and the wildlife that inhabits it. I have grown to appreciate the surrounding area and its natural beauty.

I would like to register my strong objection to the above application. This objection is not made lightly and stems from full consideration of the proposals and the impact they will have on the local area. The issues of greatest concern are the visual impact on the locality and the many diverse and often complex environmental issues which are associated with these very intensive production units (IPUs).

My reasons are elaborated below:

The scheme is in direct opposition to the growing need for farmers to curate the landscape for public benefits such as wildlife, water quality, recreation and visual appeal.

For those of us who live in this area, it is a scenic location set apart from the much flatter and expansive Vale of Strathmore. The agricultural land is enclosed between the Hill of Lour and the rising land to the north. The proposed IPU is set in a prominent position in the centre of the agricultural land on the Moss Lands of Meathie. The land-take of 46 hectares of prime arable land is considerable, and along with extensive proposed earth works and drainage measures these hen sheds and their outlying forage areas, will become a central focus. This will bring an unwelcome and significant change at odds with the existing pattern of development in an area which to date is characterised by agricultural land with scattered farm building clusters. I therefore object because of the visual impact this development will have in a scenic traditional agricultural landscape.

The environmental risks and arising issues are of great concern. The site is in a floodplain and despite all the complex drainage mitigation and pollution prevention measures proposed, I am not convinced that the inherent risks of this site can be eliminated. In drainage terms alone, this is simply not a suitable site for this development. The other features associated with these IPUs are odour, particulate pollution and adverse effects on air quality. Odour is of particular concern to me as it already periodically plagues the area from chicken litter manure spreading and storage and this annoyance will only increase if this development is approved. My land, farm houses and steading are directly down wind of the site and whatever regulation, inscrutable modelling and reassurances are offered to mitigate these unhealthy polluting effects, it can never be claimed that the proposed unit will in any way improve the local environment or air quality. In the light of recent events and heightened environmental awareness, the precautionary principle and common sense should prevail.

I also believe that there is no pressing need for this development in terms of national supply. In fact, there have been recent warnings of over-supply in this sector which could threaten the economic viability of this project. The applicant already has a large similar IPU adjacent to Craignathro Farm and this proposal will triple the capacity and the associated environmental risks and heavy traffic involved, and all within a very small area. As a result of economic conditions this development could easily fail, and the area could be left with a prominent unattractive dilapidating structure, which cannot be put to alternative use, and contaminated land. I do not believe that our area can accommodate such a concentration of this type of development, it cannot be justified on economic grounds and the overall effect on the area will be extremely adverse.

My final comment relates to the popular Ladenford Den Guide Hut and Campsite facility. This facility is under 2km from the site and adjacent to our farm complex. The land was provided and the facility was supported by my late Aunt who was Girl Guide County Commissioner for Scotland and took a great interest in it. We continue to support it and its maintenance. It is a very special and well-equipped facility which is administered by Girl Guiding Angus providing a rural outdoor experience for young people from all walks of life throughout Angus and beyond. I feel that the full enjoyment of this facility and the experience in the surrounding countryside may be greatly diminished by this nearby development.

I hope you	ı will	carefully	consider	the	points	I have	raised.

Yours faithfully,

Barty Smith



Objection to: 21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping Land West Of Easter Meathie Farm Bung...

Date: 21 September 2021 15:33:38

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 28 outbreaks of Avian Flu in the UK. https://www.gov.uk/guidance/avian-influenza-bird-flu

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, the capacity of this application will be a staggering **64,000** 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".

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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.

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Yours faithfully

Melissa Klatsia





Date: 21 September 2021 13:11:16

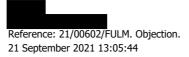
Dear sir/madam,

I would like to add my name In opposition to 21/00602/FULM erection planning application. We are still in the clutches of a pandemic directly caused by intensive farming and the animal food industry . I feel this is a massive and unnecessary risk to human health and completely object.

Kind regards Amanda Campbell.

Sent from my iPhone





The Planning Department
Angus Council
Angus House
Orchardbank Business Park
Forfar
DD8 IAN
By email:20 September 2021

Reference: 21/00602/FULM.

Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of

two

32,000 capacity free-range hen sheds and associated infrastructure.

To whom it concerns.

I wish to record an objection to this scheme. I have been fortunate enough in each of the past several years to spend an annual holiday in this area - I have enjoyed visits to Luneham Bay, the nearby Glamis Estate, the various walks in the area, and the calm traditional character of the delightful town of Forfar.

It would be a great disappointment to me (and others who have shared holiday accommodation with me) to have to experience the inevitable consequences of a large hen operation. I hope others with direct experience of this sort of intense farming operation will have time to explain more forcefully [and in more detail] than I the environmental degradation, the smell, the dangers of run-off, the visual eyesore that this proposal threatens to your happy valley.

I strongly recommend that you, as the Planning Authority responsible for the well-being of the local community, will not to be swayed by glib commercial arguments. These arguments present only a very partial view of the calamity which this proposal could bring.

If you wished to familiarise yourselves with the sort of havoc which chicken farming can wreak you may be interested to watch this programme (link: RIVERCIDE live documentary by George Monbiot, with Charlotte Church + B Zephaniah performing live - YouTube) about the consequences in the Wye Valley of up-stream farming, especially chicken sheds. Recent articles about the problems in my own neighbourhood say it all - "

'It's like pea soup': poultry farms turn Wye into wildlife death trap

Industrial-scale chicken farms 'are polluting Wales' rivers'

Lamentably, people in South Wales (where several members of my family live) are a few years ahead of yourselves in Angus in this sort of foolish experiment: and I urge you to avoid the mistakes made there.

Yours faithfully.

Grahame Hunter

Greengates, Maypole NP25 5QH





Hi there,

I am writing to you to register my strong objection for the above application.

I spend a lot of time in the area, specifically at the Lour Estate and I think that the proposed site will have an overwhelmingly negative affect on the local area.

There is already one of these sites which produces a horrible smell and we are not the only nearby residents to be affected by this. Another one of these sites will make the local area uninhabitable at times, and is surely not the direction we want to be taking our cherished countryside in. There is no need for another one of these sites, and it is not in the interest of the nation or the local area to allow it to be built.

I hope you consider the feelings of the local residents and know that we all strongly object.

All the best,

Tintin Smith



application reference 21/00602/FULM objection to this 21 September 2021 09:26:33

Dear Sir/Madam

I object to the Factory Farm as this is no life for these poor birds have on this proposed farm? What health risks will a farm like this bring and at what cost to the environment? Another pandemic could start any time and intensive poultry farms are the perfect place for one to start. Pandemics know no geographical boundaries so we believe we should be able to object to this wherever we live.

Together we can Scrap Factory Farming and protect: people from disease, animals from cruelty and the planet from further harm. I truly believe this.

With my very best wishes to you and for our shared hope for a world that is kinder to animals, people and the planet.

Kind regards Vivienne Rozario

Comments for Planning Application 21/00602/FULM

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Susan Steel

Address: 29 Court Hillock Gardens, Kirriemuir DD8 4JZ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I wish to object to the above planning application on the grounds that the visual impact of the proposed sheds and associated development will have an extremely adverse impact on the views from Balmashanner Hill and the surrounding areas. I walk in this area very frequently using the Forfar Path Network and the roads around Easter Meathie and Craignathro. One of the main pleasures of walks in this area, whatever the time of year, are the views in every direction of the beautiful Angus countryside in all its glory. The current shed at Craignathro has been sited well and has little visual impact except when you are very close to it. The sheds and surrounding land at Easter Meathie will be very obvious particularly from the top of Balmashanner Hill. I note that Craignathro Eggs Ltd. chose not to site the existing shed near their own farm buildings. The roads round Easter Meathie are not suitable for such frequent heavy traffic. I cannot believe there is a need locally for such a large number of eggs and in these days when we are conscious of "food miles" it seems foolish to further expand egg production locally. While the eggs produced can be described as free range, I have seen for myself, the sorry state of some of the birds at Craignathro - pecked by others due to stress and left almost bald and looking very unhappy. I believe that there will be very little in the way of local employment opportunities as these units are almost totally automated. The disadvantages of this proposal far outweigh the advantages.





FAO Case Ruari Kelly

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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.

We need to learn from the current pandemic & climate emergency, we do not need more intensive factory farms, we should be closing the ones we do have not opening more!

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 28 outbreaks of Avian Flu in the UK.

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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, the capacity of this application will be a staggering **64,000** 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
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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) – drugresistant 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)

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

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

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

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

ENVIRONMENTAL IMPACT

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

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

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

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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 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

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

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I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubledglobal</u> 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 hens each, totalling 64,000. 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.

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 crammed, unhygienic conditions alive until slaughter.
- •Animal mutilations without anaesthetic and no chance of a normal life.

I OBJECT strongly to this application on the above grounds.

The science is clear. Factory farming of animals is a leading cause of all the above. Need more proof – please read the research highlighted in this booklet.

https://78460747.flowpaper.com/FactoryFarmingisharminganimalspeopleandtheplanet/

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....... The future is scary and just because it may not affect us, it will affect our children and grandchildren.

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.

growing.			

Yours faithfully

Kirstin Forsythe





Pate: 21 September 2021 22:18:07

I wish to object very strongly to the application:21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

As we move to life after lockdown, I wish to draw your attention to the negative impact of

There are many huge issues here: ie. Disease, cruelty, environmental pollution, and antibiotic overuse.

landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

overcrowding of hens which are stated to be 'Free Range'.

Conditions in farms like the one up for decision today are perfect for mutating such viruses and pose a severe pandemic risk.

It is a massive risk to consider introducing an industrial chicken farm on such an enormous scale, the capacity of this application will be a staggering 64,000 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.

Genetically similar hosts- commercially raised egg laying hens are genetically very similar, create the perfect way for viruses to mutate.

Are we going to learn nothing from COVID 19?

Avian flu has been infecting poultry on a regular basis. There have been more than 30 outbreaks of Avian Flu since last November.

Whilst bird flu strains currently infect few people, as they mutate the potential for a new pandemic increases.

H7N9, an avian flu strain, has killed 40% of people who it has infected - far more deadly than Covid-19. Scientists are warning us that it is not a case of if, but when, the next pandemic occurs if we continue to farm animals like this.

The leading Virologist (Professor Yoshihiro Kawaoka) of the University of Wisconsin says: "If H7N9 viruses acquire the ability to transmit efficiently from person to person, a worldwide outbreak is almost certain..."

The World Health Organisation has said ... authorities have a responsibility for controlling – diseases transmissible from animals to humans through direct contact or through food, water and the environment.

Three out of every four new or emerging infectious diseases in people come from animals (WHO).

On top of this pandemics risk, the cramped, unhygienic conditions in these sheds also result in the high usage of antibiotics. This misuse of drugs critical to our survival is contributing to 'antibiotic resistance'. The World Health Organisation predict that infections that no longer respond to antibiotics will cause 10 million deaths a year by 2050. This could have been prevented if we weren't using the majority of our antibiotics on intensively farmed animals.

If you approve this planning application today, I want to know how you can justify ignoring the warnings from scientists?

Please consider the local community and next generation when making your decision. 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?

Please add my objection to the many others

Regards

Jacqueline Stirling

55 West Street

Hibaldstow. DN20 9NY





Email to: planning@angus.gov.uk



Objection to:

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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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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 crammed, 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. Need more proof – please read the research highlighted in this booklet.

https://78460747.flowpaper.com/FactoryFarmingisharminganimalspeopleandtheplanet/

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.

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Yours faithfully

Susanne Gray

WILL BOWEN

72, Wells Street, LONDON. W1T 3QF



21st September 2021

The Planning Dept., Angus Council, Angus House, Orchardbank Business Park. Forfar, Angus. DD8 1AN

Dear Sir,

Re: Planning Application 21/00602/FULM

The above application has been brought to my attention and left me rather dumbfounded. I have come to Forfar and stayed in the Lour valley every year for the past thirty. It is a wonderful unspoilt rural environment with fields full of potatos and raspberries as well as wheat and barley. One day on my visit this year the house filled with a rather acrid smell, which a local farmer told me was chicken faeces, a product of his neighbour's new chicken shed. If this had been a one off, I might have thought no more about it – but it was every day when the wind was in a certain direction. The farmer told me that his neighbour intended to build two more larger sheds and that the locals were not best pleased about it. Well nor are the incomers!

The land in the valley has been successfully farmed in a balanced, sustainable way for generations. I cannot see how you could possibly think that intensive egg production will enhance this in any way. It will undoubtedly harm the environment (things smell bad with good reason), almost certainly leach stuff into the water table and of course be extremely visually intrusive into the unspoilt landscape.

If this development is given the go ahead, then the house I stay in will become unlettable. So not only will I not come again, nor will the many others who rent it throughout the year. The farmer will lose his rent (and investment) and the local economy of Forfar will be shy by many visitor pounds. And all for the sake of a few eggs – which let's face it are not in short supply.

I really would like to object to this proposal in the strongest possible terms.

Yours faithfully,

Will Bowen.

Comments for Planning Application 21/00602/FULM

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Miss Laetitia Blanc

Address: 24 Lyndhurst Gardens Pinner HA5 3XG

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I strongly OBJECT to this planning application for the following reasons:

- -Pandemics
- -Climate Emergency
- -Pollution of the air and water
- -Animals cruelty
- -Poor quality of food as it contains Antibiotics, hormones, preservatives therefore it is posing an health hazard risk for humans consumption with more peaceful dying from Antibiotics Resistance, cancers, parkinson's disease, cholesterol, heart diseases...
- -This planning application do not align with your statement policies as keeping the Emissions of CO2 low.
- -Loss of biodiversity and habitats.

By now factory farms should not exist anymore as more and more people are transitioning towards a plant-based diet.

Farms should adapt to this healthier diet.

What is Toxic for the Animals, is Toxic for people is Toxic for the Environment.

There no money which will be able to pay for another planet.

Comments for Planning Application 21/00602/FULM

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Ms Joanna Mckenzie

Address: 89 Dalkeith Road Dundee DD4 7DJ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:To whom it may concern,

I am objecting to the application 21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar.

As a person who wants to see Angus council embrace action that counteracts the current climate crisis, I feel that granting this application is not helping save our children's futures. My children were educated and are still being educated by Angus Schools. Given that Angus council have partly shaped my children, I also want to see them help shape my children's future by reducing this type of intensive farming that is harming the animals and my children's future.

Please do not endorse this application.

Please also spend some time in the factory farming industry. Please witness the suffering first hand. Please spend some time killing the animals yourself. Please take some time to consider the wider impact that another factory farm has to our society over all. From the suffering of the animal to the suffering of the people who have to work in these places. Granting this application is not job creation, it is allowing misery to flourish.

Kind regards

Joanna Mckenzie

Comments for Planning Application 21/00602/FULM

Application Summary

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Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Keir Mathieson

Address: 16 Ivy Road Forfar DD83EG

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:I'm In strong support of the new shed and associated buildings.

I currently help manage the 32000 bird shed that's located up the road at Craignathro Farm and have been there for over 2 years. Which gives me a very good insight as to the workings, management, government standards, environmental impact... etc...

I think it's very important for local businesses to be supported especially in agriculture. Farming is becoming an increasingly difficult industry to be successful in. It's expansions such as this that solidify their existence within the community.

The most apparent thing in the other comments is Cruelty

Enriched caged hens can be phased out and in order for this to happen we need more Free Range Poultry Units like this. Well managed free range, organic free-range and multi-tier free-range systems allow hens to exhibit more natural behaviour. Such as Dustbathing, Perching, Investigation, Nesting, Grooming behaviours, vocalization and the ability to have their own social hierarchy. Personally I can see that these hens are enjoying their lives on a day to day basis. The regular Audits and Certification also ensure this.

Eggs are an absolutely essential food in the UK. This was clearly shown in the fist Covid19 lockdown where eggs were a scarce commodity. The fact is they will ALWAYS be needed on a large scale and it's up to the public for it to be produced in the most ethical way possible. This is a Free Range Poultry Unit.

40% of eggs are still produced In caged systems which is something the public (including me) is strongly against. How can people expect anything to change if they object to planning applications such as these?!

LOUR FARMS

LADENFORD FORFAR ANGUS DD8 2LF



#

Date: - Thursday, 23 September 2021

The Planning Department Angus Council Angus House Orchardbank Business Park Forfar

To Whom It May Concern

Re: Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping.

Reference: 21/00602/FULM.

We would like to register our objection to the above planning application.

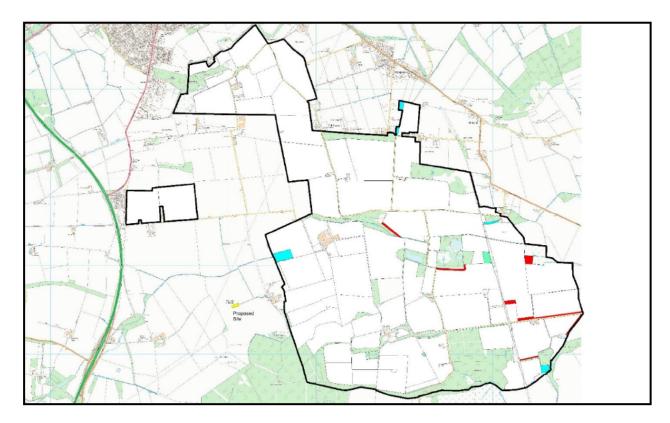
This application involves many diverse and concerning issues which will adversely impact upon on our local environment. As a result, Lour Farms have commissioned a number of experts to conduct reviews and assessments of the EIA and Planning Statement submitted by COGEO on behalf of the Applicant. The areas of concern which are being reviewed by us are as follows;

- The Visualisations submitted as part of the LVIA
- The Planning Framework and Planning Statement submitted
- The Hydrology Assessment in the EIA
- The Air Quality and Odour Management Assessment in the EIA

The Visualisation Assessment has already been submitted and the other reviews are currently under way. I therefore give notice that they will follow this more general objection letter and that we reserve the right to comment further when the reports have been completed.

I will say at this point that farming is a close-knit and interdependent community and it does not come naturally or casually to impede the aspirations of a neighbouring farmer who we know well and have worked closely with over the past thirty years. However, the implications of what is proposed are so far removed from a normal agricultural planning application deems it necessary to oppose their application. Lour Farms do not just border with the applicant's farms to the east and at points just over 550m from the

development site, but we also hold land to the north which will directly overlook the site.



I have managed Lour Farms for 30 years and know the area intimately, so the views expressed below are based on local knowledge and experience in this area over many years.

Our main reasons for objection are both visual and environmental, and are as follows;

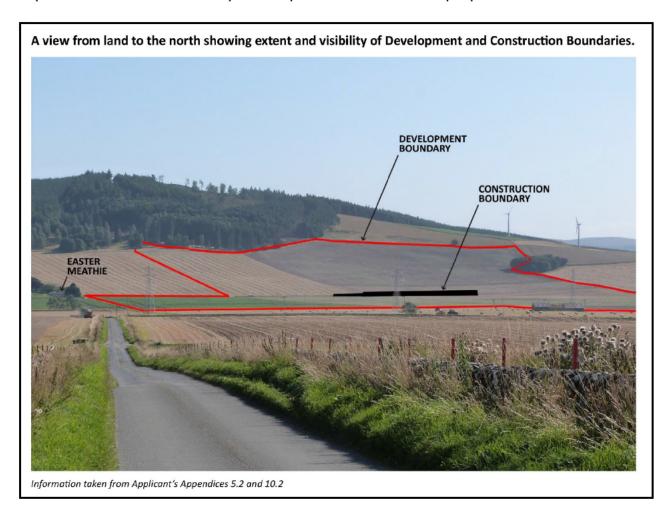
Landscape and Visual Impact

Individual views of any landscape are always subjective however I don't think anyone would deny that this is a very exposed site proposed in a small and scenic corner of Angus. It is not part of the sweeping and broad Vale of Strathmore as stated by the applicant. It is quite separate, of a much smaller scale and more intimate. The agricultural land has a sense of enclosure within a bowl between Fothringham Hill and Hill of Lour to the south and the rising land towards Balmashanner Hill to the north. The proposed development will lie centrally in this landscape on lower slope of Fothringham Hill and it will have considerable impact, particularly on views from the north, and will significantly change the current nature of this area.

Planning applications for farm buildings are generally not contentious. They tend to be constructed adjacent to existing buildings and as such do not alter the landscape in any significant way. It is very regrettable that this development would be such a highly visible departure from the characteristic traditional individual farm building clusters and will undoubtedly introduce a sense of industrialisation in the heart of a small agricultural area. I make no apology for stressing this fact. There has to be grounds to ask whether these Industrialised Poultry Units should be afforded the status of agricultural buildings.

The visual change needs to be viewed not just in terms of the buildings themselves but also the considerable surrounding arable land take of 46 hectares for the forage areas involved in this proposal. Forage areas may initially sound benign, but in a few years,

they are stripped of vegetation and become unattractive bare earth. The proposed tree planting will take many years to provide any minimal screening and will be subject to a high level of failure. Visual consideration must also be given to the cut and fill required to elevate the development for drainage purposes and to achieve a level site against the hill slope and the batter required to link to the existing track. The earthwork required will add considerably to the prominence of these proposals.



The LVIA submitted by the applicant is cursory to say the least, and the landscape description is almost dismissive and fails to describe its true nature or local quality. The visualisations, which are the subject of a separately submitted review, are totally inadequate for proper assessment and show the local area in the worst possible conditions. The lack of any views from the rising land to the north is a major omission. The viewpoint assessments based on only three visualisations are hardly credible and totally underplay the nature and significance of effect while managing at the same time to recognise 'clear and uninterrupted views of a development which will cause a noticeable change within the locality'.

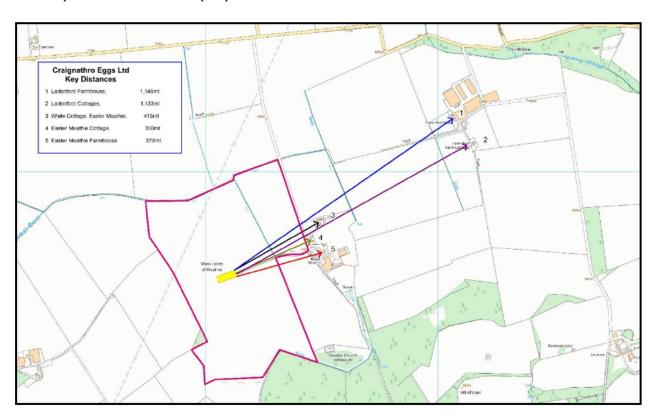
We do not accept the way in which the applicant dismisses the very obvious visual effects of this proposal and refute the claims that this development is not at odds with the current agricultural character of the locality. This is a completely different semi-industrial intensive poultry unit in clear sight which on the proposed site will bring a defining change into our agricultural landscape.

Environmental Impacts (Drainage, Odour and Air Quality)

The site proposed is on the 'Moss Lands of Meathie'. This is an area well known for flooding as it is at the low point where all the surface drainage and ground water from the Fothringham and Lour Hills plus the ground water from the rising land to the north, collects before finally draining into the Spittal Burn. I have experienced numerous periods when this low-lying ground has been under water. In addition, felling of the existing timber on Fothringham Hill is likely in time to increase the surface run-off. Numerous mitigation measures are proposed including elevating the foundation base for the structures, a bund, swales, wetland filtration, and reed bed treatment of foul water. With the predictions of future rainfall occurring in much heavier concentrations the proposed mitigation may only too easily become overwhelmed, in time it may not operate or be maintained as intended and the Spittal Burn and surrounding land could become seriously polluted. This is clearly a very challenging site in terms of hydrology and we question, in view of the proposed Drainage & Foul Water Arrangements, whether this is the right or indeed a sensible site for this development.

In this area we are already aware of the foul odour from the manure which is a byproduct of this type of intensive poultry unit particularly when stored in fields prior to spreading and when spread on the land. We recognise that it is a valuable fertiliser, but we have concerns that with two such units within such a small area comprising 96,000 birds this problem could become very pervasive, and in still conditions within such a contained landscape an already existing problem will be escalated.

We also have concerns about the harmful particulate matter and odour which is periodically released from shed unit's ventilation systems. Our residential properties at Ladenford are just over a kilometre away but directly down wind of the proposed units, however of much greater concern is the more immediate proximity of two private properties at Easter Meathie which will be only 350m and 415m from the units and again directly down wind. All five properties will be affected however, and it is our view that the EIA has not fairly considered the very severe adverse impacts on the residential amenity of the latter two properties.



As a result of these strong environmental concerns Lour Farms have commissioned two experts in Hydrology and Air Quality & Odour Management, as stated above, to review the applicant's assessments and proposed management and mitigation arrangements.

Traffic and Access

The increase in heavy traffic on our small local roads is a further aspect of concern. The applicant states that the existing infrastructure is suitable for the increased heavy traffic both during construction and for the regular heavy HGV vehicles required to service the units. We use these roads on a regular basis and they are extremely narrow, in places two cars can hardly pass each other far less a car and an HGV vehicle yet, the applicant states that there is need for improved passing places. Further, there is no consideration of the impact upon private residents of increased heavy traffic on the narrow, shared Easter Meathie access road. The increased heavy traffic required by the development will place an unacceptable burden on the small local road network.

The Planning Framework

We have considered the policies of the Angus Local Development Plan 2016. It is our opinion that this development does not blend with the character and pattern of existing development, the scale is not appropriate, and it will not maintain or improve the quality of the environment or amenity but will instead introduce risks to the natural drainage and air quality in the area, therefore it contravenes many of your own policies. As mentioned above, we have therefore engaged a Planning professional to review the applicant's Planning Statement against existing Scottish and local polices in relation to this application.

My final point for your consideration is the concentration of intensive poultry units within such a small area. The area already hosts a similar but smaller unit of 32,000 birds just 2km from the proposed site to the west of Craignathro Farm which is under the same ownership. This new application would triple the capacity of this type of unit within this locality, and all the associated environmental effects and heavy traffic required. The application makes no reference and gives no consideration to this worrying cumulative effect upon the local area.

I hope you will give all the points raised due consideration, and that you will refuse this application.

Yours faithfully,

Mr. Michael Cumming, Estate Manager, Lour Farms

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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:

Now is the time we should be reducing animal farming not increasing. We are not dependant on animal produce as we now live in the 21 century. We are however dependant on this one and only planet we live on and animal agriculture greatly impacts the climate of the planet we live on and the whole world is feeling the effects.

The welfare of the animals is a massive consideration but with the issues of animal farming as a whole it seems logical and in everyones interest that we reduce this mammoth impact. The environment is overwhelmed with building structures and our green belt is suffering immensely we need open spaces for our mental well being and building unnecessary structures is negative and detrimental to our health and the health of the planet.

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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** birds with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potential to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

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

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

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

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

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

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

ANTIBIOTIC RESISTANCE

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

and "If no action is taken - warns the (UN Ad hoc Interagency Coordinating Group on Antimicrobial Resistance) – drug-resistant diseases could cause 10 million deaths each year by 2050 and damage to the economy as catastrophic as the 2008-2009 global financial crisis. By 2030, antimicrobial resistance could force up to 24 million people into extreme poverty. Currently, at least 700,000 people die each year due to drug-resistant diseases, including 230,000 people who die from multidrug-resistant tuberculosis. More and more common diseases, including respiratory tract infections, sexually transmitted infections and urinary tract infections, are untreatable; lifesaving medical procedures are becoming much riskier, and our food systems are increasingly precarious". (https://www.who.int/news-room/detail/29-04-2019-new-report-calls-for-urgent-action-to-avert-antimicrobial-resistance-crisis)

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

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

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

"The routine use of antibiotics in intensive farming systems is driving this problem. Drugs are given to animals as a preventative measure - before they show signs of illness - to compensate for animals being housed in cramped, unsanitary conditions where infections

spread fast. Intensively reared pigs and poultry account for 79 % of UK farming antibiotic use"

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

ENVIRONMENTAL IMPACT

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

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

To quote DEFRA 2007 - "The production of food from animal agriculture is a significant source of emissions in the UK, especially the production of GHGs and pollution of water sources. For pigs and poultry, the main pollutants are ammonia and N2O. Nitrous oxide (N2O) has 296 times the Global Warming Potential of CO2 and ammonia (NH3), contributes significantly to acidification of rain and soils. The agriculture sector accounts for around 37%, 66% and 88% of total UK emissions of CH4, N2O and NH3, respectively (NAEI, 2007), nearly all of which is derived from livestock production." (http://sciencesearch.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=14662)

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

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

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

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

"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".

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its

own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
- Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- **Protected and Valued**: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 hens each, totalling 64,000. 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.

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?

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The future looks grim.

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The science is clear. Factory farming of animals is a leading cause of all the above. Need more proof – please read the research highlighted in this booklet.

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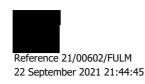
With this in mind, I write to ask you to protect today's children, from serious problems that will dominate their future if we do not act now. Not just pandemics but the climate crisis, environmental problems, antibiotic resistance...... it paints a horrifying picture.

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 Mrs. Karen Trimnell





Ref 21/00602/FULM. Application of Craignathro Eggs Ltd at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure.

Dear Sir/Madam

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

I have spent many months of my life at Lour, a farm nearby, which belongs to my Dad. I completed higher education and university in Edinburgh and was frequently a visitor to Lour and the surrounding area both then and now.

I would like to object on two grounds - firstly the impact of such a building on the natural environment itself, and secondly the impact on the natural environment as humans enjoy it.

Assessing the first reason: the clear direction of travel nationwide is toward a more integrated model of agriculture, where industrial farming (especially of animals) is rightly recognised as unsustainable (in the truest sense of the word). Just in time, we are moving to a political and social regime where the needs of the natural world are better considered. It is important that farms do not require too many artificial inputs and that they do not leave the soil and biome worse off each year. To me it is absolutely clear that an IPU on the scale of the proposed application does not meet any of these requirements, requiring a huge amount of artificial inputs and leaving the surrounding area significantly harmed by the amount of manure runoff.

Looking at the second reason: the benefit to humans of unpolluted, unharmed natural surroundings. One of Scotland's greatest assets is the incredible natural capital with which it is bestowed. In a world where people are ever more enthusiastic to travel domestically and seek peace and quiet, and are more freely able to work wherever the country is most pleasant, it seems an act of self-harm to pollute the meathie moss lands in such a permanent (and odorous!) manner.

Like many people I love walking around the countryside and nowhere more so than Lour and Forfar. Please help keep it as beautiful and welcoming as it is by considering this application for rejection.

Yours

Matt Smith Lour Forfar Angus DD8 2LR





Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** birds with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potential to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

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

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

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

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

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

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

Avian Flu (Animal influenza)

Campylobacteriosis

Psittacosis

Salmonellosis

ANTIBIOTIC RESISTANCE

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

and "If no action is taken - warns the (UN Ad hoc Interagency Coordinating Group on Antimicrobial Resistance) – drug-resistant diseases could cause 10 million deaths each year by 2050 and damage to the economy as catastrophic as the 2008-2009 global financial crisis. By 2030, antimicrobial resistance could force up to 24 million people into extreme poverty. Currently, at least 700,000 people die each year due to drug-resistant diseases,

including 230,000 people who die from multidrug-resistant tuberculosis. More and more common diseases, including respiratory tract infections, sexually transmitted infections and urinary tract infections, are untreatable; lifesaving medical procedures are becoming much riskier, and our food systems are increasingly precarious".

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

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

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

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

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

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

ENVIRONMENTAL IMPACT

The short-term benefits of employment and meat production are outweighed by the environmental impact that it will have on the local area which is already facing a climate emergency. What we eat has a huge impact on the environment and has potential to cause

disease and pandemics so applications should be considered in line with our broader responsibilities to protect future generations.

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

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

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

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

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

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

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

"Biodiversity - Farming practices can have many impacts that can lead to a reduction in wildlife biodiversity (including loss of habitats and food sources). The UK farmland bird

index, an indicator of the state of wildlife generally, has fallen to less than half its 1970 value".

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
- Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- **Protected and Valued**: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of

which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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?

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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,

Jake Clarke





Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West of Easter Meathie Farm Bungalow Lour Forfar

I hope you and your team, family and friends are all keeping safe & well.

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

Please considerably read and accept my objection to the above planning application.

My deeply considered reasons are as follows, and thoughtfully added links for further reading:

HUMAN HEALTH: - It's vital to us all!

PANDEMICS & EPIDEMICS of ZOONOTIC Diseases

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. Building another intensive chicken rearing facility will only hasten that to become a reality. It would also spoil the natural beauty of Scotland which I and assume you also, love so much!

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

Since November 2020 we have had 28 outbreaks of Avian Flu in the UK. https://www.gov.uk/guidance/avian-influenza-bird-flu

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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.

Although our society/economy is currently based on finding a quick fix, despite the immense cost

of ongoing harm & damage it does to ourselves and the world.

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 would this 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, the capacity of this application will be a staggering **64,000** 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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Scientists estimate "that more than 6 out of every 10 known infectious diseases in people can be spread from animals" (Centres for Disease Control and Prevention https://www.cdc.gov/onehealth/basics/zoonotic-diseases.html)

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

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

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

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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.

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I OBJECT strongly to this application on the above grounds.

Yours faithfully,

Rowan Cooper-Gritten

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Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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:

Before going into the many expansive reasons of why this proposal is a complete step in the wrong direction for our whole society, I would like to include my personal experiences of factory farms for poultry. I come from a farming background myself and have witnessed the suffering and extreme cruelty that is inherent with all levels of factory farming. It is a myth to use the term 'free range' when discussing a shed of this capacity. In the same manner, it is also a myth to use terms like 'high welfare'. The welfare standards allowed for in systems such as this permit the deaths of thousands of birds, without any cause for concern.

By authorising this application you would be increasing the likelihood of further global pandemics, causing immense suffering to sentient beings and causing irreparable damage to the ecosystem surrounding the location. You only have to look at what has happened in Herefordshire and the toxic levels of the River Wye to see 'Why?' Is the question you really need to be asking the committee. Why do we permit this atrocity in our civilised society?

Therefore I implore you to read the points raised below and use all the information to hand in concluding this application with a firm rejection.

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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** birds with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potential to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

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

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

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

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

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

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

ANTIBIOTIC RESISTANCE

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

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

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

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

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

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

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

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

ENVIRONMENTAL IMPACT

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

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

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

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

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

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

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
- Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- Protected and Valued: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubled</u> 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=071Sh7eMOXA&list=UUOU-2dlbbNDhtW7rHr3RG2g

Two sheds are proposed for the purpose of accommodating 32,000 hens each, totalling 64,000. 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.

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.
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- Global food poverty and UK food insecurity.
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- 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. Need more proof – please read the research highlighted in this booklet.

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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, Rebecca Hickling





ate: 22 September 2021 14:19:57

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I OBJECT strongly to this application on the above grounds.

Yours faithfully

White Cottage, Easter Meathie Farm, Forfar Angus DD8 2LF

22 September 2021

The Planning Department, Angus Council, Angus House, Orchardbank Business Park, Forfar DD8 1AN

Dear Sirs,

Re: Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping. Reference: 21/00602/FULM.

I would like to register my very strong objection to the above planning application.

My home, 'White Cottage' at Easter Meathie Farm, will be one of the closest properties to this proposed intensive poultry unit (IPU). I purchased this as my retirement home in 2012 and moved to Easter Meathie because of the surrounding landscape and the pleasant traditional rural agricultural setting. At that time the farm was in different ownership and was a successful arable farm. The bungalow which will be the nearest property to this development is still occupied by a member of the former owner's family. While I acknowledged at the time I took up residence that there would be periods of busy agricultural activity in the immediate area, never did my imagination extend to what is now proposed within 415 metres of my property. This application poses numerous issues of extreme concern which will adversely impact upon my property, my local environment, amenity, health, and well-being and I will try to deal with my points of objection in a systematic and clear way and to suppress the anger I feel about the very dismissive manner in which the applicant's agents have approached their Environmental Impact Assessment.

Residential Amenity and the proximity to the private properties at Easter Meathie.

There are three residential properties at Easter Meathie, my own at 415m distance from the proposed units, Easter Meathie bungalow at 350m distance, which are both in private ownership. Easter Meathie Farmhouse at 378m distance is currently in the ownership of the applicant but the effects there should also be taken into account as this may not always be the case.





Map with distances of houses from sheds

View of 3 houses from south west

The visual impact on all three properties will be significant and extreme as our outlook will be directly towards the development, on the same level, and it will considerably impact on the amenity of all. In addition, our properties will be subjected to increased noise from the constantly running ventilation systems, internal mechanisation, HGV deliveries and collections, and the continual activity of what is to all extents and purposes an industrial process. The units will have both internal and external lighting, a further, added intrusion and irritation.

Our amenity extends to the access to and departure from our properties and the units will be in full view on the approach to our properties and also as we leave our entrances. The current sole access from Mosside road is a straight narrow road which is not designed for the weight and frequency of such traffic with soft verges and limited passing for cars or agricultural vehicles, far less regular HGV vehicles. The HGV traffic will also pass very close to the frontage and entrance of my neighbour's bungalow which will be a particularly concerning imposition.

Of even greater concern to both myself and my neighbour is however the effects of odour and the pollutants and particulates, which are known to be harmful to health, and which IPU's of this type introduce into the air from the fans, venting flues, cleaning procedures and from the manure deposited in both the sheds and the forage areas by such a concentration of 64,000 hens. The forage areas will be even nearer to our properties as will the rather convoluted reed bed and foul water treatment units which are proposed. The applicant's Air Quality Management Assessment appears to be based on computer modelling forecasting, which is certainly not precautionary or fool proof. In the conclusion they state that "The proposed development is not forecast to result in the exceedance of any air quality standards or guidelines at any sensitive receptors". This is not, in my view, very reassuring as such things are always dependent on current knowledge, meticulous management and maintenance of the plant and regular oversight, all of which are open to question. Our properties are directly down wind of the IPU and it is inevitable that unpleasant odours and pollutants will reach our properties and have a very adverse effect on our immediate environment and probably our health. I am also concerned that due to the proximity of our houses to the sheds we will affected by the probable sharp increase in vermin and insects attracted to the immediate area as a result of the available food storage and stray eggs laid outdoors.

Overall, I believe this development can never be claimed 'to improve our environment' and it will certainly make my home and that of my neighbour a less pleasant and possibly even an unpleasant and unhealthy place to live.

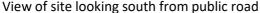
Drainage Concerns

The site area is not called the 'Moss Lands of Meathie' for nothing! It is the drainage sump for the lands north and south and flood conditions are well known locally. The visualisation from Meathie Church shows the minor flooding in the winter of 2020. The original site shown in the applicant's pre-application notice was lower and much nearer to the Spittal Burn but this proved unacceptable because of the difficult drainage conditions. It has now been relocated further up the slope. However, the drainage and water pollution concern still exists and is exemplified in the extensive measures proposed to mitigate the flood and pollution risks posed by placing the development on this site. The current and predicted increased bouts of very heavy, intensive rainfall could easily lead to much higher levels of run-off which could overwhelm the proposed drains, bunds, swales, reed beds and foul water treatment measures, and in due time the systems will silt-up and cease to operate as intended. Put simply this is not a suitable site for an IPU in view of the inherent drainage and pollution risks.

The Local Landscape

The local landscape has a small-scale distinctive character in comparison with other parts of Angus. It was one of the things which attracted me to this area. The EIA fails to present it honestly or truthfully and the viewpoint assessments are totally underestimated. I am also a bit of a photographer and the visualisations presented in support of their landscape and visual impact assessment are just shocking. They present the area in the worst weather conditions with very limited visibility and the superimposed model of the hen sheds disappears into the gloom of the photographs and gives us no idea of what this development will ultimately look like in reality. The viewpoints are very limited and one of the most important views, a commanding overview from the rising land to the north has, I feel, almost purposefully not been included.







View of site looking east from A90

In reality, this is a rather scenic corner of Angus, caught between hills to north and south with a traditional agricultural scene in between. This should be recognised. From all points of the compass, this development will be central in the wider view and the raised foundation, earth works, associated infrastructure and forage areas will all be clearly visible as a result of its very exposed position. The palliative tree planting is no more than a

sticking plaster and will take many years to achieve any screening, if ever. From all the similar units I have managed to see it should also be noted that the forage areas extending north and up the slope south of the units will quickly become bare brown earth stripped of all vegetation adding to the extent and visual impact of the development area. It is evident that what is proposed will have a very adverse visual impact on our local landscape and on local residents, road users and the many people who enjoy the wider amenity of the area.

Traffic and Access

It is highly questionable whether the local road infrastructure can support increased heavy traffic associated with this development. The public Mosside road in particular is very narrow in parts with soft edges and a car and an articulated lorry would be unable to pass each other with passing only being possible by retreating into field gateways. Currently agricultural machinery just manages with difficulty, but the addition of further regular articulated HGVs to service the proposed development may just be the straw that breaks their back and will only create frustration and resultant road safety issues. I have also noticed that the road is often used by local dog walkers and cyclists and that it forms a part of the Forfar Path Network and the Circuit of Lour which appears to be promoted for cyclists. These factors need to be taken into consideration and appear to have been ignored by the EIA.

I have already mentioned above the increased heavy traffic and associated noise which will be experienced from my home at Easter Meathie but passage on our shared private access road is also of concern. It is narrow with equally narrow verges which drop away steeply leaving no possibility of passing either construction traffic or servicing HGVs. The only acknowledgement given in the EIA is under Site Access Arrangements where some upgrading is mentioned through the laying of Grade 1 hardcore to provide year-round access (if deemed necessary during construction). It is difficult to know exactly what this means, but there is certainly no consideration given as to how residents would be impacted if they meet an oncoming HGV on this narrow road. Advance notification is all very well, but in emergencies or to make important appointments, residents need to know that they can leave their residence by car unhindered. This matter is a further burden on our properties at Easter Meathie and some clarification and more information is required. (The current access road is shown below.)







Access road looking north to public road

The Existing IPU at Craignathro Farm.

There is no mention in this application of the existing IPU at Craignathro Farm except in a footnote in the site access arrangements. This unit is in the applicant's ownership, is 2km from the proposed site in the rising land to the north and it has the capacity for 32,000 hens. The proposals for Easter Meathie will triple the IPU capacity in this small area with all the associated environmental and traffic concerns and I am very surprised that nowhere in the application is there any consideration of the cumulative effects of such a concentration of 96,000 hens on the character or environment of our local area.

Also, on the road up to Craignathro Farm there is a row of 5 cottages within the 2km zone who will have views of both IPU's from their properties. And similarly, from my own property I will have views of one IPU on my doorstep looking west and a longer view looking north of the existing unit. Why has this aspect not been considered relevant with regard to cumulative impacts on residential amenity?

Your Planning Policies

I am not an expert in Planning but as a lay person looking at the policies in your Local Development Plan it seems to me that this development contravenes a number of your own policies. This development does not contribute to the setting in which it is situated so contravenes DS3, nor does it have full regard for maintaining and improving environmental quality so contravenes DS4, nor does it enhance the quality of the landscape, its distinctive characteristics or its important views so contravenes PV6. 46 hectares of prime agricultural land will be removed from production and the scale is not appropriate so contravenes PV20. It is questionable whether this development on this site accords either with PV12, PV14, PV15 or PV18. In terms of Scottish Planning Policy, I have also noted that rural development is supported but only while ensuring that the distinctive character of the area is protected and enhanced, and that development on prime agricultural land should not be permitted except where it is essential.

This development is not essential to the applicant who already has a highly productive and diversified agricultural enterprise. In view of the recent experience of viruses resulting from intensive units of this type, particularly with poultry, and the generally heightened environmental awareness, I find this proposal regressive, there are no pressing economic or national supply imperatives for it, and in fact, eggs are nearing the point of over-production. Surely it is time for some precaution and common sense to prevail.

As a very near neighbour who will be significantly affected by this application, I hope you will fully take account of the points I have raised and my very strong and heartfelt objection.

Yours faithfully,

Douglas Watt

Submitted by email 22 Septmber, 2021



Objection to this planning application reference number 21/00602/FULM 22 September 2021 13:19:14

I am strongly objected to this planning application 21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos,egg packaging facility, vehicular access,access tracks,drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar.

My reasons are as follows:

Pandemics

We are in the middle of a pandemic that is killing people.

Scientists have predicted that the next pandemic will start as an Avian Flu.

Since November 2020 we have had 28 outbreaks of Avian Flu in the UK.

All pandemics are emerging from meat.

We cannot afford to have other pandemics as it is also dangerous to the Economy system as well as the loss of Humans and non Humans lives.

Antibiotics Resistance

Those Animals are sick and full of Antibiotics and hormones, preservatives...

Which posing a huge threat on Humans health as Cancers, parkinson's disease linked with pesticides on the milk, dementia...

And of course the Antibiotics Resistance which is killing thousands of people every year and the amount will be worst in the future.

Environmental Impact

Factory farms are the first leading cause of Global warming.

They are destroying lands, emitting C02.

Pollution of the air and water.

The loss of wildlife habitats and wildlife Animals.

The sea level is rising and we must stop those factory farms to open and the present ones.

We are at the eve of our own Extinction because we are failing to respect Animals and Nature.

We are all connected and not Above.

We need Nature and Animals to survive but they do not need us.

The Visions and Outcomes stated in the Angus Local Development Plan mention:

Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to Climate Emergency

Planning makes Scotland a Natural, Resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.

Protected and Valued: Natural environment built Environment heat and energy Networks Water Environment resources.

I cannot see anything in this Application that aligns with these policy statements.

Animals suffering

For me it should be enough to stop those horrible places to exist.

We have been lied to by telling us in the news paper that they will be phase out by now! So how on Earth instead to shut them All Down they try to open more and more?

Those poor babies are suffering each second of their miserable and short lives because people are failing to see that they are Sentient Beings and not food.

They cannot even move, can't see the daylight, being on their urine and Faeces, they look sick with their body being featherless....

What is toxic for them is toxic for us is toxic for the Environment.

Your piece of plastic money won't be able to pay for a planet B.

We can live healthy live without eating meat but won't be able to live on an unhabitable EARTH.

This nonsense has to stop before it will be our own End!

Farming can easily transition towards a plant-based agriculture as more and more people are turning plant-based.

What did we learn from the second world war?

Having another HOLAUCOST for the most innocent, vulnerable, gentle, loving Beings!?

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
- -Animal mutilations without anaesthetic and no chance of a normal life.

I OBJECT strongly to this application on the above grounds.

Which kind of Future do you want for your children?

Yours faithfully.

Thank you for taking this email with consideration and seriously.

Laetitia Blanc.

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks,

Objection to:

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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, the capacity of this application will be a staggering **64,000** 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.

drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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

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

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

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

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

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

ANTIBIOTIC RESISTANCE

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

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

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

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

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

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

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

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

ENVIRONMENTAL IMPACT

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

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

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

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

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

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

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
- Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- **Protected and Valued**: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds. A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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 crammed, 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. Need more proof – please read the research highlighted in this booklet.

https://78460747.flowpaper.com/FactoryFarmingisharminganimalspeopleandtheplanet/

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 G Jones 24 Lyndhurst Gardens Pinner Middlesex HA5 3XG

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"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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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 hens each, totalling 64,000. 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.

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- Animal mutilations without anaesthetic and no chance of a normal life.
- Mental health issues and depression arising from people who deeply care about animals not being able to do anything about it. Knowing these barbaric processes are still going on today in such an advanced world can really affect people's mental health. Me being 1 of them. I really struggle day to day knowing that so many helpless animals are living a nightmare and only waiting for death. Being vegan helps to know that I'm no longer contributing towards these terrible practices, but I still cannot live in peace knowing these unnecessary practices still happen.

The science is clear. Factory farming of animals is a leading cause of all the above. Need more proof – please read the research highlighted in this booklet.

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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 Holly Mayne

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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:

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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, the capacity of this application will be a staggering **64,000** 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.

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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 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.

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The Old Kirk, Persie, Bridge of Cally, Blairgowrie, Perthshire PHI0 7LQ

The Planning Department Angus Council Angus House Orchardbank Business Park Forfar, DD8 IAN

22 September 2021

Dear Sirs

To whom it may concern:

Reference: 21/00602/FULM - Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure.

I would like to register my objection to this application. I know this area of Angus very well, have visited it throughout my life and continue to do so having friends in the area.

My grounds for objection relate to the visual effect of the above application and good common-sense concern for the local environment.

Angus is not noted for its scenery apart from the Glens but the small area around Lour and the proposed site has some special scenic quality and distinction. As a result, it is increasingly enjoyed by the folks of Forfar for walking and cycling tours. The agricultural land still has, despite the removal of many field boundaries in recent time, a traditional appearance dotted with clustered farm buildings and contained in a basin between the hills to the north and the south. This large development will be totally out of scale with its surroundings, visible to all on the lower slop of Fothringham Hill and will negatively change the current pleasant character of the area.

I also have considerable concern about the harmful environmental effects these intensive units impose. The smell is the most obvious and I experienced the nasty odour on my last visit when manure was being spread locally from another large hen shed which already exists nearby. However, there are more hidden harmful emissions of particulates and pollutants from such sheds which affect the local environment and particularly people who live within short distances. In a time when we are all supposed to be taking greater care of our environment and when there is increased awareness of the health hazards and viruses which can be associated with such intensive agricultural practices, I cannot understand why such risks are even being considered, and precautionary principles are not applied automatically.

This is a small area of Angus well worth protecting from such industrialisation. I hope that on my next visit I shall find that good sense has prevailed, and that this application has been refused.

Yours faithfully

Sylvia Thorne







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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 doubledglobal 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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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 hens each, totalling 64,000. 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.

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?

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The future looks grim.

- More pandemics.
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The science is clear. Factory farming of animals is a leading cause of all the above. Need more proof – please read the research highlighted in this booklet.

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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.

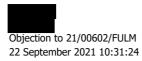
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Yours faithfully

Craig brow







Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

I formally request 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:

I am objecting to this application on both human and animal welfare concerns as well as the negative impact on the environment with the following in mind;

- 1. impact on the neighbourhood (health);
- 2. access and highways safety;
- 3. Smell, waste and environmental impact;
- 4. Noise Pollution;
- 5. Local council financial constraints;

The high turnover of traffic will significantly increase fumes/pollution from the heavy haulage. There is mounting evidence of the health dangers of pollution, which is already known to play a part in asthma attacks, heart attacks and strokes. Microscopic particles largely generated by diesel exhausts have been shown to cause lung damage and harmful changes in blood vessels and clotting.

Increased haulage/traffic causes considerable damage to the roads, grass verges, wildlife with the possibility of additional congestion. The additional haulage will also impact on the surrounding areas affecting road stability and road safety to all

inhabitants; in particular elderly residents, those with disabilities and children.

There are concerns around the impact this building will have on the already stretched infrastructure relating to a rural location; the additional need and use of buildings, roads, power supplies and sewerage/drainage system. The infrastructure will need additional financial resources which then affects the local council's budget; at a time when we are now heading into an economic recession that could take many years to recover from.

Concerns regarding the increase in waste products and potentially hazardous materials which will impact severely on local drainage (other areas where there are intensive farm units reported strong smelling liquid and stenches from their drains). There is also the increased risk of drain blockages which in turn could increase flooding to the area; if natural rain fall has nowhere to drain normally. Again, this will impact on Council financial resources with increased cleaning/clearing of the drainage system.

The environmental impacts of intensive farming are well known and documented. Waste from these types of farms has the potential to carry pathogens and bacteria, as well as heavy metals which are toxic when induced. We are still in the midst of a pandemic that has not been eradicated and this factory now wants to expose the local area to more toxins!

Residents in other areas with similar schemes report hearing animals screaming, as well as machinery, and noise increase of haulage to/from the facility. The constant noise has proved detrimental to people's physical and emotional welfare.

In respect of the economy and the benefits it will bring to the local community, I believe this would be minimal. Extra workers will predominately be employed via agencies and from outside of the area. Subsequently no or little extra trade will be spent in the local area. Again, indicating a drain on local resources with very little benefit to either the community or the council's expenditure.

Thank you taking the time to consider my objection and I hope you will take these valid points into consideration.

Yours faithfully

N Watson



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22 September 2021 10:12:16

Date:

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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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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, the capacity of this application will be a staggering **64,000** 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)

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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)

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

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

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

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

ENVIRONMENTAL IMPACT

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

Furthermore, the Government sees Local Authorities as central to delivering its ${\rm CO_2}$ 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."

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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 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)

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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".

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

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Kind Regards, Patryk

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"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 hens each, totalling 64,000. 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.

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 crammed, 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. Need more proof – please read the research highlighted in this booklet.

https://78460747.flowpaper.com/FactoryFarmingisharminganimalspeopleandtheplanet/

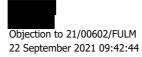
With this in mind, I write to ask you to protect today's children, from serious problems that will dominate their future if we do not act now. Not just pandemics but the climate crisis, environmental problems, antibiotic resistance...... it paints a horrifying picture.

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





Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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 on the grounds that the addition of more chicken sheds will adversely impact human health, the local and global environment, and animal welfare at a time when it is widely published and accepted that we must reduce our consumption of animals.

In more detail, my reasons for the objection 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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** birds with high population densities and genetically homogenous birds. Given the known propensity for low pathogenic viral strains to mutate into high pathogenic strains amongst poultry flocks, and potential to become more easily transmissible to other mammals, it is not scaremongering to treat this development as an ongoing risk to human health.

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

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

Scientists estimate "that more than 6 out of every 10 known infectious diseases in people can be spread from animals" (Centers for Disease Control and Prevention

https://www.cdc.gov/onehealth/basics/zoonotic-diseases.html)

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

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

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

```
--[if !supportLists]-->· <!--[endif]-->Avian Flu (Animal influenza)
--[if !supportLists]-->· <!--[endif]-->Campylobacteriosis
--[if !supportLists]-->· <!--[endif]-->Psittacosis
--[if !supportLists]-->· <!--[endif]-->Salmonellosis
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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".

 $(\underline{https://www.who.int/news-room/detail/29-04-2019-new-report-calls-for-urgent-action-to-avert-antimicrobial-resistance-crisis})$

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)

"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

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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 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-landarea)

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_d ata/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".

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

<!--[if !supportLists]--> <!--[endif]-->Planning makes Scotland a low carbon

place – reducing our carbon emissions and adapting to climate change.

- <!--[if !supportLists]--> <!--[endif]-->Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- <!--[if !supportLists]-->· <!--[endif]-->**Protected and Valued**: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubled</u> global warming, pollution, deforestation, land degradation, water scarcity and species extinction all increasing as a consequence.

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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. These are, in fact, the main reasons that I have chosen not to have children.

I OBJECT strongly to this application on the above grounds.

Yours sincerely,

Max Fraser



Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure

including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Robbie Ferguson

Address: House 2, Acharn, Rosebank Lane Forfar DD82BE

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment:I am writing in support of the proposed free range egg shed. Being a poultry worker myself, I understand and whole heartedly agree that it is not just an economical advantage but this project would supply the local community with many job opportunities especially for the younger ages. These opportunities for the younger generation can help build the groundwork for key skills such as time management along with responsibility which can be used in later employment. I feel I can stand in support for this development as I have a good understanding of the day to day running of these sheds. Many people may validly argue that it may look unappealing to the eye however like many other developments taken in this day and age I can argue that given a few weeks it will blend in to the land scape and no one will notice. As for any smell/pollution I would maintain my point that there is very little noise pollution at any time from these types of sheds (only noticing if within 10/20 meters). The development would also give way to a more constant supply of locally sourced egg produced which is seen as a strong incentive living in a world where pollution is at a worrying level. These are only some of my points put forward in support of this, I hope my points will be taken into account as I feel I supply first hand experience in this designated field.

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Helen Grosset

Address: Yew Tree Cottage Kirkmichael Blairgowrie PH10 7NB

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I was shocked and dismayed to learn about the application to erect two, 32,000 capacity free range hen sheds on valuable arable land.

The industrial sized units and silos will be a blight on an area of open countryside and residents will directly suffer from air, noise and light pollution.

We frequently travel the back roads from Kirkmichael to the East Coast to visit family and friends and know the restrictions of the road infrastructure in this area. There are no designated passing places and it would be difficult for residents and visitors to accommodate large commercial vehicles servicing the facility. Heavy usage of these roads would also impact on the wear and tear of the surface and the soft verges.

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Heather Tuck

Address: The cornerstone 75 Druids Park Murthly PH1 4EH

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: There are over 96 Intensive Poultry Units with PPC permits with SEPA and four more pending including this one. There are in total including without PPC permits over 150 in Scotland. Of those Perth and Kinross and Angus are being set up as the poultry capitals of Scotland We have requested a moratorium on all IPU applications in Scotland. The Scot. Gov wish all fertiliser spreading to cease in the present form by 2025 yet here we are with another application. Perth and Kinross have hopefully finally seen the light and managed to get their last one withdrawn when will Angus see the light? Councils are leaving themselves open to costly legal battles see Spire v Shropshire when SEPA has no control of the farmer's associated waste when it leaves their sheds as it is a fact that the chicken manure is an associated waste of the farmer and responsible for it and what it does to people in the neighbourhood. The IPU farmer must be held responsible for their associated waste once it leaves their sheds even is SEPA has no control despite their permit. We continue as in Coupar Angus to plough millions in to support these IPU's (Swinney) who employ few locals and mostly foreign workers as no one wants a job in these intensive units with a high degree of fallen stock, chickens too heavy to support their bodies etc. Please Angus Council look at Shropshire, Wales and Herefordshire who waited until their waterways were polluted before putting a stop to applications too late to save prime agricultural land from being contaminated forever. There are many already contaminated IPU's for sale in Angus and Perthshire. These units cannot be sold owing to the soil contamination. Why not reuse them? Land cannot be made. It is all that we have. Councils have been sued south of the border for not ensuring there are manure plans in place with those named and made responsible for emissions and contamination. It is not good enough for the farmer to say he will spread on his land. Signed Heather

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Case Officer: Ruari Kelly

Customer Details

Name: Mr James Barnes

Address: Cotton of Guthrie Cottage Guthrie DD8 2TL

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I OBJECT to the above planning application for the development and consequent permanent loss of prime agricultural land for the formation of a large scale industrial development for the rearing of chickens and the production of eggs. The proposed buildings are of a very substantial size and are both inappropriate and detrimental to the area and to neighbouring proprietors.

If the development is permitted to go ahead there will inevitably be unacceptable levels of noise from both chickens and vehicles, the generation of toxic pollution on a large scale, the destruction of the immediate environment, and the release of worrying quantities of Carbon Dioxide in the construction and operation of the unit. Climate change is already producing a greater volume and density of rainfall leading to widespread flooding. The construction of this proposed development can only add to the existing significant level of risk without generating any benefit to the community in the form of employment creation nor any trickledown revenue for service providers such as local shops.

The local road is totally unsuitable for use by large or artic. vehicles. This gives rise to legitimate concerns for the safety of both the drivers of such vehicles and of other road users. I respectfully submit that this application be rejected to ensure that the peace and amenity of the Angus countryside is preserved in good order for the benefit of future generations.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Bill Atkinson

Address: 36 Rowan Avenue Northmuir KIRRIEMUIR DD8 4TD

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this proposal in so many ways.

- I object to it on an environmental level because of the pollution it will cause to our water table from the run off via local streams and burns;
- I object to it for the pestilence the inevitable dead birds will attract through rats and flies;
- I object to what this can cause through airborne pollution;
- I object to the polluting odours such an enterprise will bring to the local area;
- I object to it because of the loss of prime farmland which will never recover;
- I object to it as a blight on our local scenery and loss to our walking path network;
- I object on behalf of those who are unfortunate enough to live within close proximity and see their rural countryside turned into an almighty industrial unit. I feel for them. The applicant obviously does not.

Furthermore I object because this whole planning application flies in the face of and is contrary to the Angus Local Development Plan on so many levels.

I sincerely hope the local population can see this for what it really is, the rape of our Angus countryside, and most importantly my abiding hope is that the planning committee can also see it.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr John Bell

Address: East Mains of Dumbarrow Cottage Kirkden DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I have a number of objections to this development which I believe Angus Council should act upon to refuse this application; they are as follows:

- * The visualisations supplied by the applicant do not in any way convey the dramatic and intrusive impact this development would have on the character of the landscape
- * There is a significant risk of effluent being carried downstream in the nearby watercourses, especially the Spittal Burn, and particularly during periods of heavy rain and flood
- * The major development is proposed for construction on prime agricultural land, which is contrary to the ALDP
- *The development is set apart from existing farm buildings, again contrary to the ALDP which states that agricultural developments should be contiguous with existing buildings
- * Perhaps not a planning consideration, but this development is far from being sustainable economically, as the free range egg market is very close to being in a state of over supply. Relatively early closure is a distinct possibility and this, combined with the apparent absence of any plan to restore the land to prime agricultural status, means that the development will be a permanent eyesore
- * There appears to have been no serious consideration of other locations for this development, and certainly no detailed explanation of why those locations were deemed unsuitable. Again, this

is contrary to the requirements of the ALDP

- * The nearby Guide site at Ladenford is at increased, and perhaps significant, risk from airborne pollutants and odour
- * The proposed development is in an area which is designated a Nitrate Vulnerable Zone, and it seems most unwise to risk adding more nitrates to the environment from hen droppings

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Case Officer: Ruari Kelly

Customer Details

Name: Mr Jake Stewart

Address: West Mains of Gardyne FORFAR DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I strongly object to the building of these chicken sheds. There are a number of these developments occurring in Angus (viz Cononsyth Farms) and they represent a significant challenge to the use of our arable land, and are contrary to to any sustainable development principle of the Angus Dev Plan. If this and other shed are erected it is demonstrated by the number of unused chicken shed presently in Angus that they will be simply left to go derelict as they become uneconomic to operate. This is short termism and can not be allowed to destroy the arable fields.

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Case Officer: Ruari Kelly

Customer Details

Name: Dr Elspeth Stirling

Address: Hillhead Farmhouse North Mains of Kinnettles Forfar DD8 1XF

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The Angus Local Development Plan states that such proposals must be of a scale and nature appropriate to their location and commits the Council to protect and enhance the quality of the landscape and water resources, to maintain and improve environmental quality, protect and enhance open spaces, and manage flood risks.

- This proposal is in a particularly scenic corner of rural Angus. The site is in an exposed position set against the disincentive backdrop of Fothringham Hill and Hill of Lour and will be highly visible. It will be out of character, adversely impacting on scenic southerly views from the Forfar Path Network and will become the central dominating feature
- The development is industrial in nature and does not fit with the existing traditional clusters of farm buildings. The development site will remove 113 acres of prime agricultural land from cultivation and will be of little economic benefit to our community
- The tripling of the concentration of such units within a small rural area is a development of inappropriate scale and at odds with its local character

- The need to level the site, along with the stripping back of the grass by foraging hens around the buildings, will only add to the adverse visual impact
- The site presents considerable drainage challenges requiring complex drainage and foul water measures which cannot be relied on to prevent foul water run-off and pollution in an area which is known to flood
-The development will introduce harmful particulate pollution, foul odours,noise and light pollution into the local area to the detriment of residents
- It will place an unacceptable burden on the residential amenity of the properties at East and West Meathie, Lochlands Park, on Mosside Road and at Ladenford, whilst the small, local roads are not designed for the increase in heavy vehicle traffic
- This proposal is contrary to the Angus Local Development Plan policies DS1, DS4, PV2,PV4, PV6, PV12, PV14, PV20

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Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Ryan Mackintosh

Address: The Mill Cottage Lochlands Leisure Park Forfar DD81XF

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:
Comment:Objection

This development is proposed in a particularly scenic corner of rural Angus with its distinctive backdrop of Fothringham Hill and Hill of Lour. The site is in an exposed position set against the lower slope of Fothringham Hill and will be highly visible within the local landscape. It will be out of character and will adversely impact on scenic southerly views from the Forfar Path Network in which it will become the central dominating feature.

The development is industrial in nature and does not fit with the existing traditional clusters of farm buildings. The proposed development site will remove 113 acres of prime agricultural land from cultivation and will be of little economic benefit to our community.

The area already has a smaller similar unit, and this much larger unit will triple the concentration of such intensive poultry units within a small rural area producing a pattern of development of inappropriate scale, at odds with its local character.

The construction of these large units involves significant cut and fill to achieve a level site and this, along with the stripping back of the grass by foraging hens around the buildings will considerably add to the visual impact of the development.

The site presents considerable drainage challenges requiring complex drainage and foul water measures which cannot be relied on to prevent foul water run-off and pollution in an area which is known to flood.

The development will introduce further harmful particulate pollution, foul odours, noise and light pollution into the immediate area to the detriment of residents and the local roads are not designed for the increase in heavy vehicle traffic, placing a particularly unacceptable burden on the residential amenity of the properties at East and West Meathie, Ladenford, on Mosside Road and at Lochlands Park.

This proposal does not accord with Scottish Planning Policy or Angus Local Development Plan policies DS1, DS4, PV2, PV4, PV6, PV12, PV14 or PV20.

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Application Number: 21/00602/FULM

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Sally McLaren

Address: 35 west hemming st Letham Angus DD8 2pu

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- This proposal is in a particularly scenic corner of rural Angus. The site is in an exposed position set against the disincentive backdrop of Fothringham Hill and Hill of Lour and will be highly visible. It will be out of character, adversely impacting on scenic southerly views from the Forfar Path Network and will become the central dominating feature
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- The need to level the site, along with the stripping back of the grass by foraging hens around the buildings, will only add to the adverse visual impact
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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Stuart McLaren

Address: 35 west hemming st Letham Angus Dd8 2pu

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- This proposal is in a particularly scenic corner of rural Angus. The site is in an exposed position set against the disincentive backdrop of Fothringham Hill and Hill of Lour and will be highly visible. It will be out of character, adversely impacting on scenic southerly views from the Forfar Path Network and will become the central dominating feature
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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Anna McAuley

Address: 1maryfield farm Rosemill rd Bridgefoot, angus Dd8 2pu

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- This proposal is in a particularly scenic corner of rural Angus. The site is in an exposed position set against the disincentive backdrop of Fothringham Hill and Hill of Lour and will be highly visible. It will be out of character, adversely impacting on scenic southerly views from the Forfar Path Network and will become the central dominating feature
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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Alan Mcintyre

Address: 8 st Michaels yard Dundee Dd4 9ap

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- This proposal is in a particularly scenic corner of rural Angus. The site is in an exposed position set against the disincentive backdrop of Fothringham Hill and Hill of Lour and will be highly visible. It will be out of character, adversely impacting on scenic southerly views from the Forfar Path Network and will become the central dominating feature
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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Robert Mcintyre

Address: 8 st Michaels yard Dundee Dd4 9ap

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- This proposal is in a particularly scenic corner of rural Angus. The site is in an exposed position set against the disincentive backdrop of Fothringham Hill and Hill of Lour and will be highly visible. It will be out of character, adversely impacting on scenic southerly views from the Forfar Path Network and will become the central dominating feature
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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Miss Kirsty McGray

Address: 1 Mains of balmadies cottages Angus Dd8 2sh

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- This proposal is in a particularly scenic corner of rural Angus. The site is in an exposed position set against the disincentive backdrop of Fothringham Hill and Hill of Lour and will be highly visible. It will be out of character, adversely impacting on scenic southerly views from the Forfar Path Network and will become the central dominating feature
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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Michael Rushforth

Address: Summerhill House Guthrie Forfar DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This is an industrial development being built on prime agricultural land, contrary to ALDP-DS1 and with no provision for reclamation of the land.

It will have a major impact on Amenity (ALDP-DS4) in that it will be responsible for emission of high levels of bio-toxins risking the health of those living and involved in leisure activities in the vicinity of the buildings.

It will also have a major negative visual impact. Considering the descriptors in Tables 7.1, 7.2, 7.3 COGEO EIA document, this is Medium Sensitivity landscape and Visual Receptors will have High Sensitivity (leisure users) and the development in this highly rural landscape will represent a High Magnitude of Change. This combination of effects means that the development will have a significant negative visual impact (ALDP-DS4).

It is also planned in close proximity to non-farm related dwellings, contrary to Scottish Govt. planning guidelines.

The development will increase the flood risk in the area. Those of us familiar with keeping hens know that they destroy surface vegetation due to their scratching behaviour, which leads to compaction of the surface and surface water run-off. This will lead to hen droppings being washed from the range areas into local drainage channels causing significant pollution (ALDP-PV14 Water Quality).

No coherent plan is presented for the disposal of the large quantities of highly polluting waste which will be produced. The development will result in the generation of large quantities of greenhouse gas emissions on an on-going basis and this type of development does not build towards Angus Council's target of a Net Zero Economy. This is not a sustainable development and definitely should not built on this prime agricultural land.

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Anna MCAuley

Address: 1 Maryfield Farm, Rosemill Road. Angus Angus Dd3 0PW

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:The erection of two very large chicken sheds in this area of outstanding beauty would be grossly out of proportion and visible from all angles. It would require a lot of invasive groundwork to level the site and will appear stark and industrial on an exposed slope of traditional agricultural land. It will not be in keeping with the other agricultural buildings currently by this site or neighbouring dwellings.

Also, the Canmore Straight is a fairly narrow road and already the large haulage traffic going to Craignathro farm has already put strain on the integrity of the road with lots of erosion and pot holes occurring regularly. As a regular user of this road it can be very unnerving to meet enormous lorries driving at speed on this stretch of road; this would only increase.

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Case Officer: Ruari Kelly

Customer Details

Name: Ms Jean Marshall

Address: 6/2 351 Glasgow Harbour Terraces Glasgow G116DJ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I have often visited this area as I have a friend whose home will be within 400 m of the proposed development if it goes ahead. I think this development will be a huge blot on a very rural landscape. I don't think it is fitting in terms of the current land use. I would also say that a development of this scale and character as well as being visually polluting ,could also lead to airborne pollution through particle spread and smell.

I am also aware of the local roads network and would doubt its suitability to cope with the increase in traffic which such a development would naturally give rise to.

In light of the above issues I would hope that the development does not go ahead.

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

above. These intensive poultry units

in produce narupid pollution and spoll

the country side

Marie Taylo

Address 60 Tay Lochlands parla

Dunclee Road farpas

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

The local roads are not designed for the increase in heavy vehicle traffic

Address

Loch Rando Jerrior Park Forfar DD81XF

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

THE SHEDS WILL PRODUCE AIR BORNE POLLUTION, NOXIOUS SMEll, NOISE AND. LIGHT POLLUTION.

NAN HENDERSON

Address PIOT 3 LOCHLANDS LEISUNE PARK

DUNDEE ROAP

FORFAR

DD8 1XF.

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

The local roads are not designed for Such heavy traffic and will be hazardous for both residents and visitors

Address

52 LOCHLANDS CARAVAN. PARK FORFAR DD8 1XF

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

It will be hazardous to both residents and Visitors and will also be too close to neighbouring houses



Address 56 TAY Lochlands Park Angus

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

The Steeds will produce air borne pollation, Norious Swells, Noise and Light Pollation.

Tatensive Poulton whits produce harmful polation | Smell and Spoil the Country Side.

Address

The Meadows Forfer

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted

THE SHEDS ARE FARTO CLOSE TO HOUSES
AND THE ROAD IS ALREADY FAR TO BUSY
WITH HEAVY LORRY'S.

THIS WOULD HAVE A VERY BIG IMPACT
TO EV

31 THE MEADOWS
DOWNER ROAD
RORFAR
DD81XF

19 SEPT 21

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

J feel there sheds will produce air borne pollution, bad smells and because of their capacity will also produce excessive noise Apart from their one can only imagine the impact the aiditional traffic will have to everyone who lives in the stea as well as anyone visiting

Address

Balvenie 1 Westfield Ciescent FORFAR. DD8 1EG.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Ms Morag Malcolm

Address: Summerhill House Guthrie Forfar DD8 2SR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I object to this proposed development for the following reasons:

- 1. It will result in the loss of prime agricultural land (ALDP-DS1) with no reinstatement proposed (ALDP-PV4).
- 2. Industrialization of a rural area when other sites are available and the siting and design will not integrate with the landscape (ALDP-V6).
- 3. Artificial light associated with the proposed development will have a detrimental effect on wildlife e.g. bats and insects (ALDP-PV4).
- 4. Fencing around the proposed site will obstruct natural wildlife corridors (ALDP-PV4, PV5), again adversely impacting biodiversity.
- 5.. Increased traffic on country roads necessitated by this project is at odds with the Angus Council Plan's declared intention to deliver its programme of cycling, walking and safer routes supported by Scottish Government funding (ALDP-DS4, PV3).

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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:

I feel this is an inhumane and unfair process. This is a simple solution to a very complex, interrelated problem. The council must think about the global effects a vile, polluting chicken farm like this will have given the time we are in. It also must consider that there are far better ways to produce food that don't result in animal suffering. I have lived in and around the Angus area most of my life - and this is not what I or my family want.

My other reasons:

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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** 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. <a href="https://www.gov.uk/government/publications/list-of-zoonotic-diseases

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

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

ANTIBIOTIC RESISTANCE

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

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

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

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

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

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

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

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

ENVIRONMENTAL IMPACT

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

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

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

 $(\underline{http://sciencesearch.defra.gov.uk/Default.aspx?Menu=\underline{Menu\&Module=More\&Location=None\&Completed=0\&ProjectID=14662})$

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)

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
- Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- **Protected and Valued**: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

GLOBAL HUNGER

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Yours faithfully, Chell Kincaid

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I'm asking that you read, share & take action!

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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?

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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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"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"

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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 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.

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Objection to 32,000 capacity hen shed, Forfar. 26 September 2021 11:23:07

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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)

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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 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.

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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 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)

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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".

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

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I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: <u>Britain's rivers are suffocating to death | George Monbiot | The Guardian</u>

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"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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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?yeo7ISh7cMOXA&list=UUQU-2dIbbNDhtW7rHr3RG2g

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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

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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 factory farming absolutely abhorrent and think it disgusting the way we continue to treat these animals in pursuit of the Great British pound! There is more than enough food on this planet already!

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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Lisa Digweed



Objection to: 21/00602/FULM Erection of two 32,000 capacity free-range hen sheds 24 September 2021 23:24:44

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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:

I'd like to know how 32,000 in sheds can possibly be classed as "free range". How much access to fresh air and open space will they actually have? What size fields will so many hens have available? I object strongly to this proposal on animal welfare grounds.

I also object for the following reasons...

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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."

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

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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.

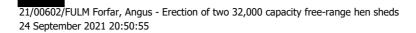
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I OBJECT strongly to this application on the above grounds.

Yours faithfully

Susan Berry





Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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:

We are currently in a process of change in the world; more so since the pandemic started as people are more aware of issues connected with the environment and animal agriculture. There is a growing movement of Vegans and plant based eaters now more than ever before and so continuing to push for these types of farming methods is a step back for society in its current progression. It is time to end this type of practice and move forward for the sake of ourselves and the animals.

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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It is a massive risk to consider introducing an industrial chicken farm on such an enormous scale, the capacity of this application will be a staggering 64,000 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.

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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"

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Yours faithfully

Miss Karol Lomas





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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: As well as the extensive list below, we need to move away from the mass murder of sentient animals. Whether it is labelled free range or not, the animals are kept in cruel conditions and suffer a cruel existence.

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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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

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

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Yours faithfully

Kind regards,

Paul Singh 6 Barkmill Road Aberdeen Ab25 3bp





Please accept my objection to the planning application: 21/00602/FULM Forfar, Angus - Erection of two 32,000 capacity free-range hen sheds.

We are facing a climate crisis where livestock farming currently accounts for 14% of the world's carbon emissions. We should be encouraging plant-based diets and more sustainable farming methods. Most of the world's agricultural land is used to grow feed for livestock rather than crops for humans.

We're in the middle of a pandemic and intensive animal agriculture is a known source of emerging diseases. I live in Aberdeen and do not want another farm on my doorstep with tens of thousands of intensively reared animals increasing this risk. We have seen what enormous consequences we all must bear whether we eat chickens and eggs or not.

I love the peace and beauty of the natural scenery in Scotland and in particular appreciate the clean rivers and lochs. Intensive livestock farming puts undue pressure on our waterways and is not worth the risk. We need clean water more than eggs.

Antibiotic resistance is very real and very frightening. Most of the antibiotics produced on the planet are given to livestock. Without antibiotics routine surgery that we have the luxury of today will become dangerous and impossible.

I urge you to put our climate, our health, and the environment first. Please do not approve this plan.

Best wishes, Rachel Martin AB11 Aberdeen





I wanted to express my objection to planning permission to 21/00602/FULM Erection of two 32,000 capacity free-range hen sheds.

As a nation we should educate and stop the cruel practices of factory farming. Animals are sentient beings and deserve to be raised in more humane conditions. Scotland should stand strong for animals who can't speak for themselves.

Factory farming is a **leading cause of antibiotic resistance**, is one of the most significant contributors to the climate crisis, continues to ravage the natural world and poses serious risks to our health and the future of humankind.

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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.

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My reasons are as follows:

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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, the capacity of this application will be a staggering **64,000** 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".

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

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

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

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

ENVIRONMENTAL IMPACT

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

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

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

production."

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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 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)

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

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I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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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 <u>doubledglobal</u> 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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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

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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

Aleksandra Mykita Ab123TJ 51 Wellington terrace Aberdeen







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Please accept my objection to the above planning application.

My reasons are as follows:

We are living in an age where consuming animal products like eggs is entirely unnecessary for human survival and health, and overwhelmingly destructive in a number of hugely significant ways to the animals, people and natural habitats affected (which is pretty much everything inhabiting this planet currently). The meagre benefits we gain from continuing and expanding current practices involving animals within the food system (financial profits for a very small number of people, a very specific taste pleasure for many that could easily be replaced with the plethora of equally tasty experiences that are available today, a feeling of political safety in not rocking the boat and propping up the existing system) are entirely dwarfed by the colossal weight of the problems caused by the current status quo, most of which are outlined below. These practices will come to an end one way or the other, as they are not physically sustainable on this planet of finite resources. And surely we'd prefer them to end because we finally decided to grow up, face the truth and make the changes required for the survival of all beings, in our own time and control, rather than by mass migration, starvation and death at an unprecedented scale that will force us to change whether we want to or not? For these reasons, as well as those outlined below, I couldn't object more strongly to the above planning application which will ADD to a problem we should be doing everything in our power to resolve.

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

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

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

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

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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 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."

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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 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)

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

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I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds. A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

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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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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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?

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The future looks grim.

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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 George Montagu

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** 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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Ashley James Morgan

LE/EMPS/IK

Town and Country Planning (Scotland) Acts 1997, 2006 and 2009

PROPOSED EASTER MEATHIE INTENSIVE POULTRY SHEDS

Angus Council Reference: 21/00602/FULM

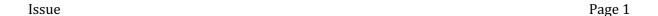
OBJECTION

on behalf of

LOUR FARMS

(adjacent landowner and third party objector)

Submitted: 24th September 2021



Background

- 1. This <u>objection</u> has been prepared in respect of the planning application 21/00602/FULM submitted by Craignathro Eggs Ltd for the erection of two 32,000 capacity "free-range" hen sheds and associated infrastructure including feed silos, egg packing facility, vehicular access, access tracks, drainage and landscaping at land to the west of Easter Meathie Farm.
- 2. The objection has been prepared on behalf of Lour Farms, an adjacent landowner immediately to the east of the Easter Meathie Farm and whose amenity and interests are likely to be adversely affected by the proposed development. The objection has been instructed by Mr Mike Cumming, the Farm Manager for Lour Farms.
- 3. This objection document addresses the relevant planning policy and material considerations for the application and sits alongside the other submissions on behalf of Lour Farms. The objection has been prepared by Ian Kelly MRTPI, an independent Planning Consultant, and a chartered town planner with over forty four years' experience in the public and private sectors, mainly in Scotland but also involving work south of the Border, and in Europe, mainly in Scandinavia. His relevant project work has included expert witness advice in relation to a very considerable number of EIA type development proposals. He has specific experience of assessing intensive agricultural units in Powys in Wales including reviewing technical environmental reports, considering LVIA issues, giving evidence at an appeal Inquiry, and following up on the consequences of the relevant proposals being approved contrary to the views of the local Planning Authority.
- 4. This objection should be read alongside the other technical assessments prepared on behalf of Lour Farms including the Visualisation Assessment already submitted to the Planning Authority.

The Application Documentation

5. The applicant has submitted extensive documentation in support of the application.

That documentation includes a Planning Statement. The response to that Statement on behalf of the objectors is set out in the Development Plan Assessment in this objection

document. There are also sections of the EIAR and supporting material that deal with odour and air quality and all aspects of hydrology. These matters are being addressed in separate assessments on behalf of Lour Farms and no related technical commentary is included in this objection submission. However, in terms of the parts of the submitted EIAR that are procedurally relevant to the planning policy assessment there are two aspects that are of concern.

- 6. The first aspect is that of alternatives. "Alternative Sites" are addressed in paragraph 4.4 of the main EIAR. However, the bulk of the text here relates to the detail of the site requirements for the proposed operations (on the application site) alongside issues around the micrositing of the units within the wider application site. There is no listing of alternative locations with, say, a matrix based assessment of the scoring of each against key requirements or characteristics. There is no consideration of alternative farm development or farm diversification options. Therefore, contrary to the requirements of the Regulations, there is no explanation of the main reasons for the selection of the preferred development/location and the rejection of the alternatives.
- 7. The second aspect that has not been properly assessed, under various headings, is that of cumulative environmental effects. As set out in paragraph 16.6 in the main EIAR Report Angus Council had confirmed that a "full cumulative impact assessment" could be scoped out, however cumulative effects should be addressed under the relevant chapters "where necessary". That seems like a rather strange response. However, taking it at face value, it would be expected that there would then be a "Cumulative Effects" sub section within each of the technical chapters in the main EIAR Report. However, looking at the EIAR, there does not appear to have been any detailed consideration of cumulative effects for any individual EIAR topic chapter. For example, there is an existing intensive egg production unit, for 32,000 birds, at a location just 2.1km from the current planning application site (no EIAR was required for that proposal). That combined situation, on its own, would clearly indicate that there are likely to be cumulative environmental effects from these two locations. It is a requirement of the EIAR Regulations that cumulative effects are considered and assessed. The application material has failed to do this. In terms of cumulative effects,

the Council will wish to note that the current situation in Powys, as reported in the national press and as predicted in the appeal evidence given by Mr Kelly, where there are now significant adverse environmental effects, particularly from the effects of waste disposal on the aquatic environment, that are arising from the cumulative effects of a widely dispersed but numerous set of similar intensive egg production and chicken rearing units.

8. The above two aspects add to the case against the proposal.

The Position of SEPA

- 9. Paragraph 3.3.2 of the applicant's Planning Statement correctly identifies the scope of the SEPA Regulatory Scheme via the IPC Permit system. This paragraph also recognises that some aspects of Permit process will be of interest to the Planning Authority.
- 10. The view of the objector is that the interaction between the planning application system and the IPC/PCC Permit system is an absolutely critical aspect for the determination of this planning application. The Council in addressing this key aspect, needs to be fully mindful of the current severe limitations of SEPA's activities following the well documented cyber attack. In short, the Council should take full account of the response from SEPA but should not rely on SEPA to be able to proactively monitor and police this type of high risk development.
- 11. The consultation response from SEPA is not yet available for this application and, therefore, that is likely to one of the key aspects to be addressed in later submissions (see the second last section in this document).

The Position of SNH/NatureScot

12. SNH/NatureScot had not responded to the application by the time this submission was lodged. Again this will be addressed at a later stage.

The Cononsyth Poultry Sheds Application – 21/00337/FULM

- 13. This application is effectively made by the same team as that behind the Easter Meathie application and is also proposing two 32,000 bird capacity units and associated facilities. It is interesting to note that the application material is of similarly poor quality. In particular there are inadequate and poorly put together visualisations.
- 14. However, the key aspect from this other application is that SEPA have provided a consultation response and that is considered further below.
- 15. SEPA responded to the application on 9th June 2021. Whilst the response was one of no objection it then proceeded to set out various highlighted issues that the applicant would need to address (and discuss with SEPA's Intensive Agriculture Team) prior to applying for a PCC Permit. These matters included detailed design and environmental management aspects for noise, odour, waste and water. Significant concerns about the Nitrate Vulnerable Zone were raised for the Council to address. There is criticism of the Air Quality Assessment and one consequence is that it was not possible to assess the potential impact to designated nature conservation sites. A detailed technical guidance document was attached to the consultation response. It is assumed that SEPA will adopt a similar response to the Easter Meathie application.
- 16. The comments of the Council's Environmental Health Officer (EHO) on this application have been noted with interest. It can be seen that new Information has been supplied by the applicants in response, and it is assumed that a similar approach will be taken with the Easter Meathie application.
- 17. It is no part of this submission to analyse in detail what is happening with this similar application. However, what this brief review does establish is that there are many issues that are likely be raised by SEPA (and possibly others) that will require to be resolved prior to the determination of this type of application both at Cononsyth and Easter Meathie. The Council will also need to give careful consideration as to whether any subsequent reports supplied by applicants in response to consultation responses constitute Additional Environmental Information that will need to be advertised.

The Development Plan Assessment

- 18. To ease the process of the cross comparison of differing professional views, the policy assessment in this section of the objection follows the same policy order as adopted by the applicants in their Planning Statement. In considering the planning policy issues around the landscape and visual effects of the proposal clear regard was had to the full extent of the application site and the likely extent of construction related activities as well as to the built elements of the proposal.
- 19. It is considered that the correct approach to assessing the detailed acceptability or otherwise of this proposal is through the consideration of the Development Plan (and then material considerations). The overall up to date Angus Local Development Plan 2016 (ALDP) policies provide a full basis for the assessment of the submitted application.
- 20. There is no single policy in the ALDP that deals exclusively with intensive agricultural production units. However, there are several other policies that can be considered and these are addressed below, although not every sub section of every listed policy is relevant. In addressing the planning policy issues careful regard has been had to the discussion earlier on the role of SEPA and on the overlapping role between the Angus Council and SEPA. The additional specialist reports commissioned on behalf of Lour Farms have also been noted in terms of the issues they are likely to raise.
- 21. Policy DS1: Development Boundaries and Priorities provides that developments outwith development boundaries will be supported where they can demonstrate that they are of an appropriate scale and nature for their location. The application site is outwith any defined development boundary. The proposal basically comprises two very large rectangular sheds and associated facilities set in the middle of a visually exposed field. The buildings are completely out of scale with any other built development in the immediate visible hinterland and would harm the current open views in the area. The requirements of Policy DS1 are not met.

- 22. Policy DS3: Design Quality and Placemaking requires that development should be designed to a high standard and draw upon the characteristics of the landscape setting. In this case, and taking into account the albeit poor quality and limited visualisations provided in the application, the proposal for two large visually prominent sheds and ancillary facilities does not blend with either the landscape or the pattern of existing development. The proposal, in this location, is not visually linked with the existing farm steadings. There is nothing to suggest that working farms in the Angus countryside need this industrial scale of development comprising two large linked sheds and associated facilities. The requirements of Policy DS3 are not met.
- 23. Policy DS4: Amenity requires that all proposals must have full regard for maintaining and improving environmental quality and amenity otherwise development will not be permitted. It should be noted here that the test is one of maintaining and improving. Having regard to the likely levels of noise, smell, waste, dust, manure, and traffic along with the risks of flooding and the adverse visual and landscape impacts from this form of intensive agricultural production in this location, the proposal is not maintaining environmental quality and amenity and it is certainly not improving these two aspects. The requirements of Policy DS4 are not met.
- 24. Policy PV6: Development in the Landscape seeks to protect and enhance the quality of the landscape, its diversity, its distinctive local characteristics, and its important views and landscapes. Again it is noted that the relevant test is one of protect and enhance. Having regard to the Visualisation Assessment submitted by Diana Royce on behalf of Lour Farms, and taking into account what can be easily seen in a site visit to the application site and the surrounding area, it can be concluded that the proposed development neither protects nor enhances the landscape. The requirements of Policy PV6 are not met.
- 25. Policy PV7: Woodland, Trees and Hedges seeks to protect these features. For this application it is accepted that the necessary provisions both for protection and for new planting could be covered by planning conditions and, therefore, this is not a key determining ALDP policy.

- 26. Policy PV9: Renewable and Low Carbon Energy Development primarily deals with standalone renewable energy proposals. Although the proposed design incorporates some renewable technology it is not considered that this policy is one to be factored into the determination of the application.
- 27. Policy PV12: Managing Flood risk is the first of several policies where the overlap between the Planning Authority and the SEPA IPC/PPC regulatory frameworks is key to the assessment and determination of this planning application. Flood risk has been addressed within the application documentation but there is, at present, no SEPA consultation response and, therefore, the objectors do not know what will be said about the flood risk assessment, the SUDS design and the associated additional drainage structures. However, given the topography of the site and the local knowledge of past flooding, there is considered to be a very high risk of both flooding and of pollution caused by flooding affecting watercourses. Any effects on the rest of the flood risk area are uncertain. Pending sight of the consultation response from SEPA it is considered that the proposals are in breach of Policy PV12.
- 28. Policy PV14: Water Quality overlaps with the control activities of SEPA as outlined above when considering Policy PV12. It is considered that, based on similar operations elsewhere, the risk of pollution effects on water quality are very high. Furthermore, the applicant does not set out what would be done if the proposed mitigation measures fail. Pending the sight of the consultation response from SEPA it is considered that the proposals are in breach of Policy PV14.
- 29. Policy PV15: Drainage Infrastructure overlaps with the considerations in addressing Policies PV12 and PV14. The conclusions are the same.
- 30. Policy PV18: Waste Management in New Development is a key policy for this type of intensive agricultural production facility. There are two aspects the construction phase and the operational phase. For the construction phase, and notwithstanding the adverse visual impacts from the cut and fill to create a level area, it is accepted that the matter of demolition and construction waste could be controlled by conditions on any planning permission. For the operational phase it is certainly correct that the management of the chicken litter is regulated by SEPA under the IPC/PPC Permit

system. However, the environmental effects of that regulatory system, including manure volumes, manure disposal systems, dust, smell, run off pollution, ecological effects, traffic effects and the consequences of errors in the waste arisings and disposal calculations are all material planning considerations that will need to be considered by the Planning Authority. It is also unclear, post the major cyber attack, if SEPA has yet regained the ability to properly monitor and enforce the controls normally set out within an IPC/PCC for this type of proposed development. A precautionary approach, taking account of the experience elsewhere, leads to a conclusion that the proposal is contrary to the provisions of Policy PV18.

- 31. Policy PV20: Soils and Diversity provides that where development is proposed on prime agricultural land support will only be given where the proposal meets the development strategy and policies of the ALDP and where the scale is appropriate to the landscape in which it is located. The assessment set out above in respect of the various policies shows that the tests are not met. The proposal is therefore contrary to Policy PV20 (and also contrary to SPP2 on this same aspect as set out later).
- 32. The Council also has relevant Supplementary Guidance in place in the form of Advice Note 1: Farm Buildings, the Design and Placemaking Supplementary Guidance and Advice Note 21: The Siting and Landscaping of Built Development in the Countryside. However, as set out above, the proposed development has been found to not be in accord with the key policies that lead to the Guidance and, therefore, further detailed analysis is not needed for the purposes of this objection.
- 33. Therefore, in summary, and pending sight of the consultation response from SEPA, it is considered that the proposed development is not in accordance with Policies DS1, DS3, DS4, PV6, PV12, PV14, PV15, PV18, and PV20. That conclusion should lead to a presumption in law for a refusal of planning permission for the proposal unless material considerations indicate otherwise.

Material Considerations

34. For this type of proposal it can be agreed that NPF 3, SPP2 and the claimed benefits of the scheme are all important material considerations.

- 35. NPF3, at paragraph 1.6, seeks a sustainable, economically active rural area in Scotland whilst safeguarding natural and cultural assets. Growth must be sustainable. The planning policy based assessments above show that this is not a sustainable form of development proposal.
- 36. SPP2 again focuses on sustainable development with the overarching objective being to secure the right development in the right place. In relation to the material consideration of the planning policy protection of prime agricultural land, paragraph 80 of SPP2 provides that development on prime agricultural land (as applies in this case), or land of lesser quality that is locally important, should not be permitted except where it is essential. The only one of the three exceptions that is relevant to the consideration of this proposal is that of "a small scale development directly linked to a rural business". The proposal is certainly not small scale and, therefore, this key aspect of SPP2 is not complied with. That adds significantly to the case for refusal of planning permission.
- 37. In terms of the benefits of the proposed development these are entirely private in the form of revenue and profits. There is no identified public benefit to be balanced against the adverse effects of the proposed intensive egg producing poultry sheds.
- 38. Therefore, having regard to the above, the review of material considerations does not change the presumption that flows from the assessment in terms of the ALDP.

Overall Planning Policy Assessment

- 39. In reaching the overall conclusions in this planning policy objection the approach has been to address the submitted documentation, take account of the experience elsewhere with this type of proposed facility, address the Development Plan policy assessment, and then take into account material considerations.
- 40. It is considered that the asserted material benefits of the proposal are entirely private to the applicants. There are no public benefits identified to be weighed in the balance in the assessment equation.

- 41. In terms of the planning policy aspects, the proposals have been assessed against the Local Development Plan and Supplementary Guidance. Based on what is set out in the text of this objection, and as will be addressed in the other reports commissioned on behalf of Lour Farms, it is concluded that the proposed development of the intensive egg production poultry sheds and associated facilities is contrary to the Local Development Plan all as detailed in the Development Plan Assessment set out above. That conclusion should lead to a presumption in law for the refusal of planning permission for the proposal unless material considerations indicate otherwise.
- 42. Therefore, the initial overall conclusion of this objection is that the proposal is not in accordance with the Development Plan and that, therefore, the presumption is for the refusal of planning permission for the Easter Meathie Intensive Egg Production Poultry Sheds application.
- 43. As set out in this objection the range of material considerations, including the NPF3 and SPP2, does not change the conclusion that arises from the Development Plan assessment and it can also be concluded that the proposal is not in accord with National Planning Policy on account of its inappropriate siting, the unjustified use of prime agricultural land, and the range of significant adverse environmental, landscape and visual effects on a variety of sensitive receptors.

Conclusions and Objection Submission

- 44. There is no doubt that the preferred position of the objectors is, therefore, that Council should proceed in early course to refuse planning permission for this Easter Meathie Intensive Egg Production Poultry Sheds proposal on the grounds of non compliance with the Development Plan all as detailed in the objection.
- 45. However, it is fully appreciated that the Council may conclude that there is a need for further objective evidence, addressing *inter alia* the concerns set out in this objection and the related supporting material, before reaching a determination in respect of the application. That situation, and the need for a more general update to the objection is addressed in the following section.

Further Submissions

- 46. This objection submission has been lodged by the advertised deadline of 24th September 2021. This has been done to ensure that there can be no doubt as to the status of the planning policy objection should the application be refused and an appeal lodged. However, it is very likely that a range of relevant material, including further statutory consultation responses, information requests from the Council (as noted above) and perhaps further reports or clarifications from the applicants when they see the various statutory responses and objections, will be submitted to the Planning Authority after that date.
- 47. Therefore, it is intended to undertake a review of all material for planning application 21/00602/FULM that is on the Council's ePlanning Public Access portal as of late October/early November. At that stage it is probable that a supplementary objection submission, possibly with additional technical documents, will be submitted in order to properly reflect the then up to date position.

Caveat

48. The objectors accept that, notwithstanding the many planning policy and environmental objections to this proposal, it would be open to the Council to seek to grant planning permission to the application. Should that happen it remains the clear view of the objectors that adverse effects and environmental risks are almost inevitable. Therefore, to enable effective management, control, and mitigation by the Council, it is formally requested that any planning permission (if that is the outcome) is accompanied by a S75 legal agreement that would be binding on all interested parties to the development, including landowners, now and in the future. The detail of the legal agreement would be for discussion after any Committee resolution but, as a minimum, it should cover two requirements. The first would be to make the applicant and landowner parties fully liable for all costs of dealing with all pollution incidents caused by the operation of the facility. The second would be to enable the Council to revoke the planning permission, without compensation, at the point of the third recorded pollution incident.

[END]

Submitted: 24th September 2021

Ian Kelly Planning Consultancy Ltd.,



REF: 21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

Over the the ears i have become more aware of the impact of factory farming on all the issues raised below. It is really shocking that 'factory farming', which is what this is, still goes on to this day. The killing of male chicks when there are people starving in the world, the cruelty and great negative impact to human safety and health alone are reason enough to stop these plans. Anti biotic resistance is also one of the main reasons this sort of farming should stop. in the future people will not survive operations and fight drug resistant diseases. I strongly object to these plans and hope that the committee consider all the very serious issues below when making their decision and I ask that a copy of this letter is made available to the whole Committee.

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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** 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. <a href="https://www.gov.uk/government/publications/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

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) - drugresistant diseases could cause 10 million deaths each year by 2050 and damage to the economy as catastrophic as the 2008-2009 global financial crisis. By 2030, antimicrobial resistance could force up to 24 million people into extreme poverty. Currently, at least 700,000 people die each year due to drug-resistant diseases, including 230,000 people who die from multidrug-resistant tuberculosis. More and more common diseases, including respiratory tract infections, sexually transmitted infections and urinary tract infections, are untreatable; lifesaving medical procedures are becoming much riskier, and our food systems are increasingly precarious". (https://www.who.int/news-room/detail/29-04-2019-new-report-calls-for-urgent-action-to-avert-antimicrobial-resistance-crisis)

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

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

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

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

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

ENVIRONMENTAL IMPACT

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

Furthermore, the Government sees Local Authorities as central to delivering its CO_2 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)

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
- Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- Protected and Valued: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubled</u> 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=UUOU-2dlbbNDhtW7rHr3RG2g

Two sheds are proposed for the purpose of accommodating 32,000 hens each, totalling 64,000. 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.

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?

<u>SUMMARY</u>

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 crammed, 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. Need more proof - please read the research highlighted in this booklet.

https://78460747.flowpaper.com/FactoryFarmingisharminganimalspeopleandtheplanet/

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 Miss Thex Soul Monorgan Longforgan Dundee Angus DD2 2HT

The Planning Department Angus Council Angus House Orchardbank Business Park Forfar, DD8 1AN

21st September 2021

Reference: 21/00602/FULM - Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure.

Dear Sir/Madam

I would like to register my objection to the application for this intensive egg production unit in an area which I know well and visit often.

This little corner of Angus is really rather scenic, traditional and even the roads are very small-scale. This development is however, quite the opposite, being large-scale, almost industrial and plonked right in the middle of the agricultural area where it will be totally out of place and an eyesore within the local landscape. I therefore object on the grounds of its incongruous visual appearance.

One has to also query the wisdom of this type intensive poultry egg production. It is not just the obvious impact on the short lives of the poor birds concerned but also all the bio-hazards and local environmental effects these intensive units impose. They are I understand known to emit harmful dust, pollutants and odours from the copious amount of manure created and I totally support the concerns of local residents who will be most badly affected. It is my understanding that we all seek to improve our environment, to reduce our carbon footprint and foster only sustainable development. This development will not only threaten the local environment, it will have a significant carbon footprint, it will remove good agricultural land from cultivation and it cannot be considered sustainable. Any faith in the word 'free-range' has been rather shattered by what is proposed here. Coming from farming family I can't but be very disappointed that in Scotland quantity is still winning out over quality and that we appear to have learnt nothing from the background and causes of recent virus outbreaks. I therefore also object on environmental grounds because of pollution risks to the local area from such a misplaced and ill-conceived intensive egg producing poultry factory.

I hope that common sense will prevail and that this application will be refused.







To Whom It May Concern,

I am writing to object to the Application of Craignathro Eggs Ltd for the erection of two

32,000 capacity free-range hen sheds and associated infrastructure.

I am the daughter of Barty Smith who is the owner of Lour Estate. I visit Lour throughout the year and have done since I was born. I am very fond of Lour House, Lour Farms and surrounding land and I hope that I will continue to visit in years to come. However, with the new application it brings much concern that this could ruin the countryside. It is **unbelievably** smelly, environmentally unfriendly and will pollute the water. It is not what farmers are supposed to be doing in terms of looking after the countryside. It would be highly disappointing to turn such a wonderful part of the country into a potential uninhabitable area.

I hope you will consider my points above and recognise my love, and many others, for this part of the country.

Yours sincerely, Milly Smith

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Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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

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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?

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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)

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- Psittacosis
- Salmonellosis

ANTIBIOTIC RESISTANCE

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

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

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

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

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

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

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

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

ENVIRONMENTAL IMPACT

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

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

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

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

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

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

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
- Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- **Protected and Valued**: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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 crammed, 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. Need more proof – please read the research highlighted in this booklet.

https://78460747.flowpaper.com/FactoryFarmingisharminganimalspeopleandtheplanet/

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





Date: 23 September 2021 12:19:40

Sir or Madam,

I write in connection with the application to erect two large hen sheds near Lour. I have been visiting Lour for more than 30 years, and am dismayed at the visual impact that these structures would have on the beautiful landscape which we all appreciate and come to visit. Please reject this application.

Thank you for your consideration.

Regards,

Jonathan Gaisman



Comments for Planning Application 21/00602/FULM

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure

including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Carol Robertson

Address: 30 Easton Drive Shieldhill Falkirk FK1 2DR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I have friends who live near the proposed site and the installation of these large industrial style units which will produce pollutants, smells and noise will have a dramatic impact on the well being and health of those living nearby. Their houses will be overshadowed by these buildings and will be subject to the noise and pollution from the lorries used to supply the site. The sheds will be visible for miles around, degrading the character of the countryside and ruining peoples' enjoyment of such a rural scene.

I understand that the Council's Local Plan undertakes to not only protect but positively improve the land and environment but this development can only damage the countryside and the size of the operation is completely inappropriate in this area.

Please reject this application

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

The sheds will produce air borne pollation, noxious smells, noise and light pollution.

15 Rannock Lochlands Caravan park

19 September 21

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

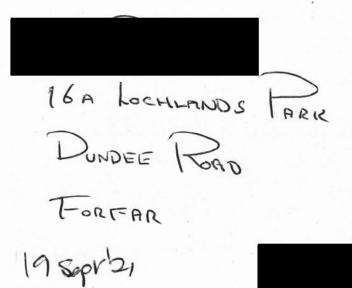
TRAFFIC USING ROAD NOT BIG ENOUGH FOR LORDIES

POLLUTION AND SMELL

TO NEAR HOUSES

SPOILING COUNTRYSIDE VIEWS

Address



Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

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Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

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Address

19 Locklando

FORFOR

DD83XE

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Doreen Corlett

Address: 90 Crofton Road Attenborough NG9 5HW

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I wish to object to this planning application which appears to be contrary to so many of the Council's policies as expressed in the Angus Local Development plan. This proposal cannot be considered to be of a scale and nature appropriate to its location or to contribute positively to the character and sense of place of the area in which it is to be located.

There will be large industrial buildings in an attractive, open rural setting which will be very visible and completely at odds with everything around them.

Flooding has been and will continue to be a serious risk, along with the ensuing pollution. The effect on the nearby residents from the air pollution, smells, continuous noise and exterior light can scarcely be imagined whilst the increase in heavy traffic on roads which are not designed for such vehicles will badly affect local road users and those simply wishing to enjoy the countryside through which the Forfar Path Network runs.

If a proposal which is at such conflict with the policies of the Local Plan is not rejected Angus will become the centre for such developments, to the detriment of its residents and completely changing for the worst this lovely part of the countryside

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

These intensive poultry units protoce homeful pollution and the spoil the

Address

53 TAY LOCHLANDI. CARAVAN PARK.

19 SEPT 21

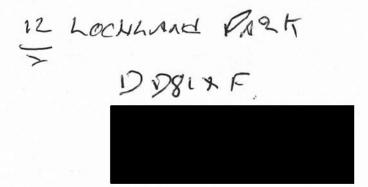
Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

THE SHEELS WILL AM Advense IMPACT ON THE CH MRONMENT AND RURAL LANGSARE

Address



Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

Johnsie aft in sofes bail and be work of these sents of some and some south of the ton ob the same some south and beta beta beta of the sent this seas they can be sooned from Romany.

Address

Sodge 14 Socklands Holdery Park Forfar DD8 IXF.

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

Sheds will have an adverse impact on anvironment and lands cake.

Ernel for chiebens

Pollution ter coundry siele, small, etc.

Address

Johan Pork

DD8 IXF.

19 SEPT 2024

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Marie Pudlewska

Address: 49b Suttieside Road Forfar DD8 3EL

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Having friends who live at Easter Meathie I am well aware of the impact that this proposal will have on their lives and health. This a lovely, unspoilt part of the local countryside and these huge sheds will be completely at odds with their surroundings, destroying their outlook, polluting their air whilst the noise of fans and chickens will be a constant reminder of the industrial plant on their doorstep. These facilities attract rats, other vermin and insects which can also invade their properties, making their lives a misery. The lorries servicing these sheds will pass close to their homes on roads totally unsuited for such traffic, adding to the noise and pollution in what was a quiet rural setting.

Surely the Council has policies in place to protect its residents and those who enjoy the pleasures of the Angus countryside and must enforce them. The sheds will dominate the view for miles around, completely changing the nature of the landscape.

There is already a large chicken shed at Craignathro and an even bigger one so close by is an unwelcome concentration in such a small area, destroying its rural character.

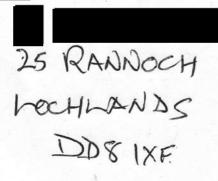
I object strongly to this proposal.

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

THE INTENSIVE BULTRY UNITS WILL
PRODUCE NOXIOUS SHELLS AND.
POLINTION, HARMING THE COUNTRYSIDE



Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

TOO CLOSE TO NEIGHBOOKING HOMES)
ADDITIONAL TRAFFIC, HASDEDOUS,

Address

1 LODGE PACK LOCHLANDS FORFAR DDS IXF

19th September 2021

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

THESE NEW SHED'S WILL

CAUSE POLLUTION

TO THE

AREA

Address 9 LOUTLANDS LODGE AMMY DUNDETE RD

FOR FAR PD8 IXF

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

THE SHEDS WILL HAVE AN ADVERSE IMPACT ON THE ENVIRONMENT AND THE RUFAL LANDSCAPE

Address JOHN TOSH.

18 PITRODDIE GONS

DUND EE

DD3 90R

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

The development is industrial in noture and does not fit in with the existing land scape.

Address

Brackmont
West End
Crail
Fife KY 10 3RH:

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

One to the increased traffic on Previously quiet country roads The buildings will be incongrent with the surrounding country side

legards

Address

Hillview 22 E The Meadows

Lochlands Leisure Park

Forfar

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

The sheds well produce air borne pollution also noise + light pollution and the sheds are being built too close to neighboring houses

Address

Lockland Caravan PK.

Forfol. DD8 IXF

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure set out in the application noted above.

THE SHEDS WILL PRODUCE AIRBORNE POLLUTION, NOXIONS SMELLS, DOISE + LIGHT POLLUTION

Address

5 RANDOCH LOZHLANDS FOR FAR DD81XF



Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Miss Gordon Colville

Address: 4 Mayflower Gardens Loanhead EH20 9DH

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I travel to this area regularly to see family and the proposed site is far to close to the nearby residential properties. The adverse smells, noise and lighting will have a significantly detrimental impact on the ability for residents to enjoy their homes and will negatively impact property values.

The narrow roads are already dangerous and the increase in traffic will have a detrimental impact on local residents and visitors.

I believe the proposal is contrary to the Angus Local Development Plan policies DS1, DS4, PV2,PV4, PV6, PV12, PV14, PV20

New Postal Address

7 Gilroy Gardens, Darnick, Melrose TD6 9FA

APPLICATION REFERENCE

Rape land

16-9-2021

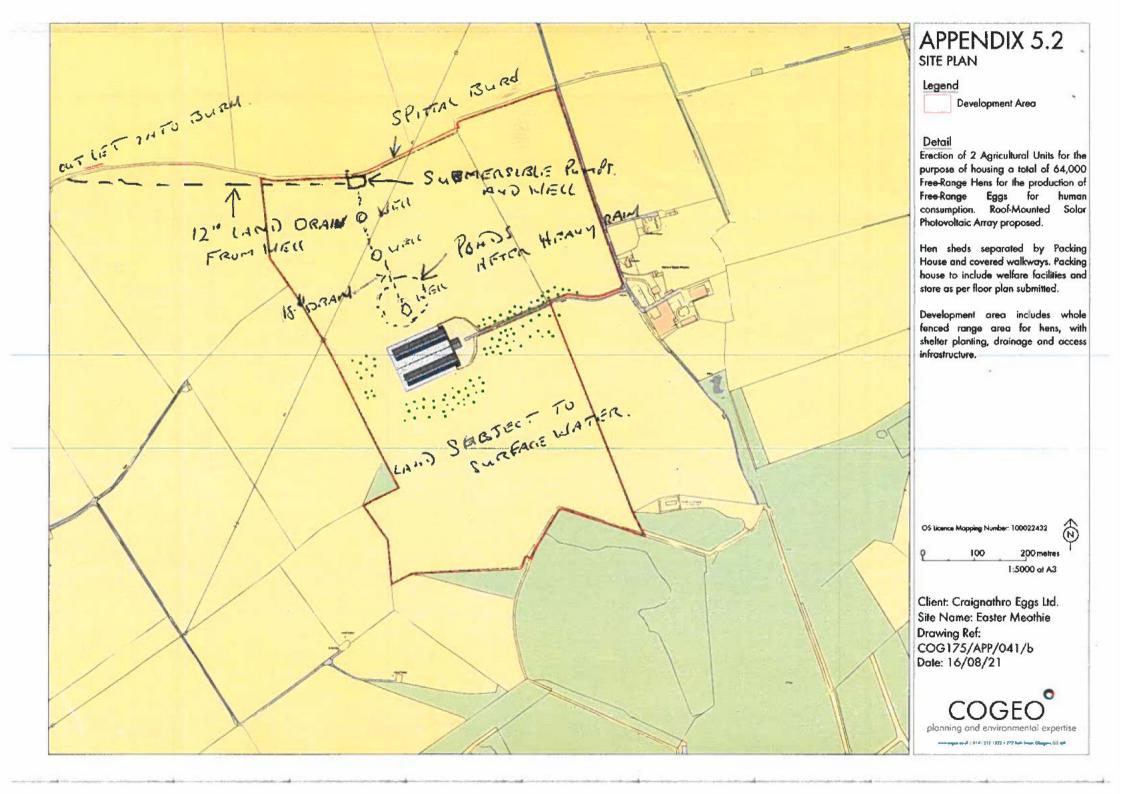
EASTER MEATHE HEN 441TS - REFERENCE 21/00602 FULM

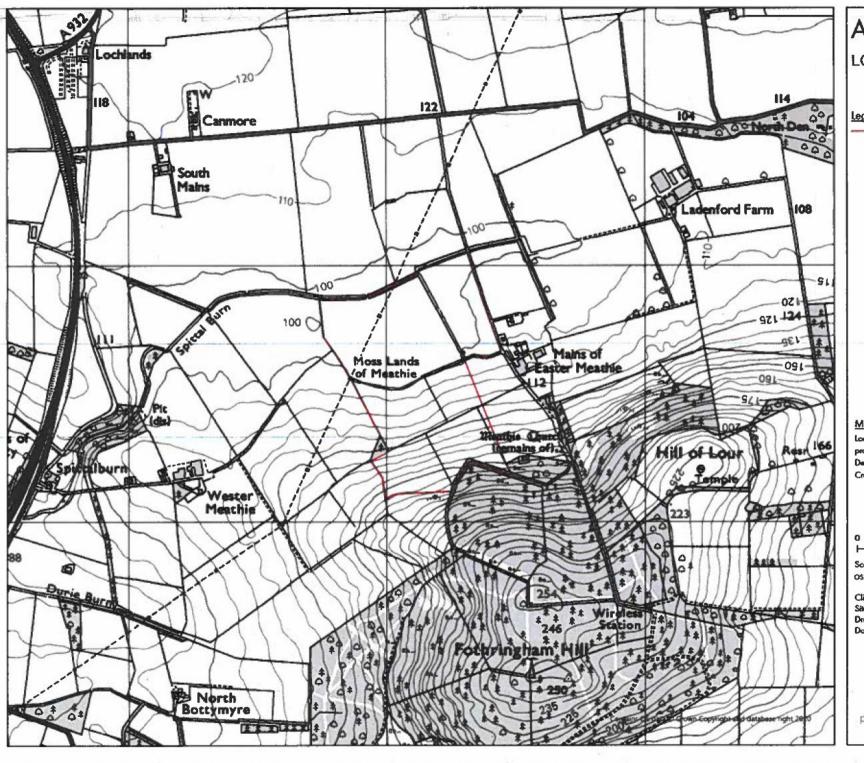
REASONS FOR OBJECTING TO EASTER MEATHE PRPOSACS

Deer Sirs, gowned and farmed Easter Meather
Farm for 30 years along with my Son, Graham
who was a Partner
who was a Partner
unfortunately he died in 2016 - 9 then
unfortunately he died in 2016 - What
sold the farm to Groug nathro Farms Ltd. After 30 years experience of that land a then Unit of that size should not be built there. In very wet weather, surface water mus offer the land above the units and will run through the land Free Renge land on to the flat lands below the units. This contaminated water will form ponds every
This contaminated water will form ponds every
glar on the plat land beyond the units
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Two submersible pumps will pump 24 hows
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pumps will run for a few days
pumps will run for a few days
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approx 60 meters from the Units
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APPENDIX 5.1

LOCATION PLAN

Legend

Development Boundary (Leased)

PLEASE

Map Details

Location plan detailing the development boundary for proposed hen shed development at Easter Meathie. Development area leased to Craignathro Eggs Ltd from Craignathro Forms.

> 250 500 m

Scale at A3: 1:10,000 OS Mapping Licence Number: 100022432

Client: Craignathro Eggs Utd Site: Easter Meathie

Drawing Reference: COG175/APP/030/d

Date: 16/08/23



planning and environmental expertise

www.cogeo.co.uk | 014 | 212 1322 | 272 Buth Street, Glosgow, G2 4.8

THIS SHOWES THE STREPHEN OF THE (AND ALSO
AND THE MATER FROM THE WOOD ALSO
DRAINS DOWN TO THE MOSS LANDS OF MEATHER

PRITTHAT HAD BEEN KINSHED OUT

WATER RUME DOWN THE FIELDS

SUBMERSIBLE PUMPS

Y HOUSAND TONS OF WATER

WERRY 24 HRS

FRUN MOSE LAMPS.

OF MEATHUE

IN FLOOD CONDITHIONS

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs SUSAN LOVELL

Address: 22 MAIN STREET GLAMIS FORFAAR DD81RU

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:THESE SHED WILL SPOIL THE COUNTRYSIDE AND THE FRESH AIR WITH THE SMELL OF CHICKEN MANURE PLUS I DO NOT AGREE WITH HENS REARED IN LARGE

SHEDS, YHEY ARE NOT FREE TO ROAM OUTSIDE ITS CRUAL

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: George MacPhail

Address: 5 Station Cottages Glamis Forfar DD8 1QF

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: My objections are as follows -

Visual impact - Views from the local hills will be spoiled by these huge ugly buildings.

Totally out of place in a beautiful location.

Heavy vehicle or transport - Feed will have to be delivered in massive quantities, this means many deliveries on the very small local roads. Waste will have to be removed or moved elsewhere and this is even more transport on these small tight roads.

Waste - Massive amounts of waste will probably be spread heavily on local fields and nearby farms.

"THE River Wye is facing an "ecological disaster" because of manure from chicken farms in Powys, environment groups have warned."

The local streams and rivers will be contaminated and everytime a heavy shower happens, chicken manure will be washed into the waterways killing fish and other aquatic insects etc.

The warnings are out there already on these massive chicken expansions, let's keep them away from Angus.

Storage of massive heaps of chicken poop and run off will kill anything it touches.

Application Summary

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Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Dawn Taylor

Address: 10 Dundee Road Forfar DD8 1HR

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:In scenic rural angus, does not fit with the rural landscape or road capacity, will create noise, pollution and odour to nearby dwellings.

Application Summary

Application Number: 21/00602/FULM

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Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr allan coutts

Address: 7 taylor street fofar DD83JQ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This proposal takes some of the country's best farmland out of production, replacing it with sheds producing greenhouse gases and other pollutants

These large industrial sheds will be visible for miles around and are of a scale which is totally out of character in this rural setting

The sheds are too close to neighbouring houses which will be blighted by air-borne pollution, smells, noise, increased heavy traffic, rats and flying insects

The fields are prone to flooding and this risk will be increased due to the building work with the danger of polluting the burn running through the property

There are already 32,000 hens within 2km and this proposal will increase this to 96,000 hens, which will completely change the rural nature of the area

The local roads will not take the increase in lorry traffic and will become more hazardous for drivers, cyclists and walkers enjoying the countryside

The exposed position of the sheds will dominate the views of the countryside from the Forfar Path Network

The application contravenes the principles of the Angus Local Development Plan which commits the Council to protect the environment and landscape for all. See Plan objections

Application Summary

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Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Donald Grant

Address: 6 Jamieson Street Forfar DD8 2JE

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Area not suitable Also all Roads are B@C Class And not for HGV Lorrys. Also The Smell that comes into Forfar when They spread Hen Muck on the Fields and must Not go ahead.

Mike Cummings Lour Farms Ladenford Angus DD8 2LF By email

Dear Mike

Review of Air Quality and Odour Impact Assessment

I refer to your instruction on behalf of Lour Farms, Ladenford, Angus DD8 2LF to conduct a review of the air quality and odour impact assessments for the proposed development of the above poultry intensive livestock units (ILU) at Easter Meathie Farm by Craignathro Eggs Ltd.¹ [Planning Application Reference No 21/00602/FULM]. The site location is shown in Figure 1.

Technical Review

I have conducted a technical review of the air quality and odour assessments including the following documents:

- COGEO 8th June 2021. Air quality impact assessment Easter Meathie version 1.0
- JJP Environmental Services 2021 Odour Management Plan
- COGEO 19th July 2021 Appendix 11.1 Predicted Odour Concentrations

This review concentrates on the odour impacts described in the air quality impact assessment (AQIA) associated with the proposed scheme as being the most relevant consideration for amenity.

The odour from spreading of litter can be a significant source of annoyance and impact on amenity. This has not been taken into account in the assessment. The Odour Management Plan refers to spreading of litter on land remote from the permitted site. The disposal of litter has the potential to cause significant loss of amenity, either on its own, or in combination with odour from the proposed installation itself. Further details on the arrangements for the spreading and disposal of litter are required. This issue has been grounds for refusal at a recent planning appeal.² In a separate case, also in Shropshire, the High Court overturned the approval for a new poultry ILU on the grounds that the local planning authority had failed to adequately consider the potential impact from the spreading of poultry litter on adjacent fields as part of its duties under the EIA Regulations.3

The potential combined impacts with the existing ILU at Craignathro have not been included in the assessment. This could lead to significant under-estimation of odour impacts, particularly at locations where the process contribution from the two new units is predicted to be just under 3 OU_E/m³ 1 hour 98%ile and this could increase the magnitude

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¹ Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping at Easter Meathie Farm.

The Planning Inspectorate 13th October 2020. APP/L3245/W/20/3253658. Cruckmeole Farm, B4386 Junction Cruckton to A488 Cruckmeole, Cruckton, Shrewsbury, Shropshire SY5 8JN (para 23) states: ' I conclude that whilst the proposal would not be unacceptable as regards noise, it would have an unacceptable effect on the occupiers of nearby residential properties by way of odour due to manure spreading

³ https://cornerstonebarristers.com/cmsAdmin/uploads/r-(on-the-application-of-squire)-v-shropshire-counciljudgment-24-may-2019.pdf



of impact from Slight Adverse to Moderate Adverse in terms of the odour criteria discussed below.

The scheme proposes two units each housing 32,000 birds using an Aviary system for egg layers. The proposed ventilation system will consist of 4 horizontal fans on each unit discharging at a height of 2m above ground level with a reported efflux velocity of $\sim 10 \text{m/s}$. The conventional best practice method for ensuring effective dispersion is to use roof-mounted fans so that emissions have good initial dispersion. The proposed release is likely to cause the emissions to be entrained in the recirculating wake and increase the extent of the odour 'footprint' from the proposed installation.

The technique used to model these horizontal releases is not explained within the AQIA. It is a requirement of the Royal Meteorological Society Guidelines on Dispersion Modelling⁴ that dispersion modelling studies should include a sensitivity analysis for model inputs, to provide an estimate of the possible errors in the predictions, and be sufficiently transparent to enable independent third-party review without recourse to the author. There is insufficient information to allow this review to be conducted.

The dispersion model used in the COGEO assessment – ADMS 5.0- can model horizontal releases (defined as Jet releases) but this is a complex approach and means that building and terrain effects on dispersion cannot be considered.

It is therefore normal practice to model this condition as a volume release with zero velocity, to reflect the poor initial dispersion conditions. The approach used in the assessment requires further explanation and justification.

The AQIA relies on meteorological data from Dundee Airport. This ground station does not include measurements of cloud cover, which is an essential parameter for dispersion modelling. The assessment does not report what cloud cover data has been used in the dispersion model.

The assessment states that the dispersion model assumes a minimum M-O length of 30m. This is typically used to model dispersion in towns. A minimum M-O length of 1-10m would be more representative for rural conditions.

The details of building orientation reported in Table 6.3 do not correspond with the layouts shown in the AQIA and its Appendices.

The odour emission rate of $0.69~OU_E/s$ for each of the proposed 8 side wall horizontal fans, as reported in Table 6.5, appears to be a gross underestimate. The emission factor used in the assessment (from SCAIL)⁵ is 44150.4 k OU/bird/year. My calculations for the total emission rate from the proposed installation are set out in Table 1 below.

Table 1 - Summary of Odour Emission Rate for 64,000 birds

Emission factor	44150400	OU _E /animal place per year
Emission rate	1.4	OU _E /s per bird
Total odour emission rate	89600	OU _E /s

The Airshed Ltd, 5 Lauder Place, East Linton, East Lothian EH40 3DB
Tel: 01620 860529 www.theairshed.com mail@theairshed.com Registered in Scotland Company No. SC309129

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⁴ Royal Meteorological Society May 1995. Policy Statement Atmospheric Dispersion Modelling Guidelines on the justification of choice and use of models and the communication and reporting of results
⁵ SNIFFER March 2014 SCAIL Agriculture Update ER26 Final Report

The odour emission rate reported in the assessment is therefore out by at least three orders of magnitude. This is a fundamental error. The COGEO assessment may therefore not be relied upon to assess impacts on amenity.

Airshed Dispersion Modelling

I have conducted three model runs (two for Scenario 1 and one for Scenario 2) to provide some indication of the likely impact from the two proposed ILUs. These predictions are indicative as they do not include a detailed model sensitivity test and rely on a single year of hourly sequential meteorological data from RAF Leuchars. Scenario 1 is based on the assumption that each unit has 16 roof mounted fans discharging vertically – the model runs for Scenario 1 report the predicted concentrations with and excluding for the effects of terrain on dispersion (using OS Landform Panorama data). Scenario 2 considers the emissions from the two ILUs as volume releases, reflecting the condition where the four fans exhausting at near ground level on each unit will have poor initial buoyancy. The predicted concentrations at fixed receptor locations are presented in Appendix 1.

The results from these predictions indicate that the odour impact extends significantly beyond the nearest dwelling. These results are presented in Table 2 below. The Scenario 1 contour plots are shown in Figures 2.1 and 2.2 (no terrain and with terrain effects respectively). This shows that including the effects of terrain significantly increases the impacts at dwellings near Easter Meathie and reduces the impacts elsewhere. The predicted contours for Scenario 2 (where terrain effects are included and where the releases are modelled as horizontal emissions close to ground level) are plotted in Figure 3. This confirms that odour impacts are likely to be significantly less where the emissions are released from high velocity roof-mounted fans above the apex of the ILU roofs.

The current SEPA odour standards⁶ are not based on any recent research into odour and annoyance. Given the uncertainties in dispersion modelling, community annoyance and source estimates for this process, it is prudent to aim for an odour exposure as low as reasonably practicable, rather than a specific odour concentration. The setting of standards should also take likely model errors into account. I have assumed that an odour benchmark of $3 \text{ OU}_E/m^3$ 1-hour 98%ile annual will provide adequate protection for amenity.

Table 2 – Summary of Predicted Odour Impacts (Airshed)

Receptor name	X(m)	Y(m)	Scenario 1 No Terrain	Scenario 1 With Terrain	Scenario 2 With Terrain
R01 Easter Meathie	346451	746708	3.2	6.8	9.4
R02 Easter Meathie	346500	746652	3.5	6.3	12.7
R03 Easter Meathie	346481	746779	2.2	5.1	5.4
R04 Wester Meathie	345151	746177	0.6	0.8	0.8
R05 Wester Meathie	345026	746171	0.5	0.7	0.7
R06 Spittalburn	344700	746138	0.3	0.5	0.5
R07 North Bothymyre	345191	745323	0.2	0.3	0.3
R08 South Bothymyre	345285	744881	0.2	0.2	0.2
R09 Dwelling west of Little Lour	347265	744865	0.3	0.1	0.3
R10 Little Lour	347879	744877	0.5	0.1	0.2
R11 Little Lour	348105	745021	0.8	0.2	0.3
R12 Lour House	347764	746217	2.7	0.5	1.3

⁶ SEPA 2010. Odour Guidance

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Receptor name	X(m)	Y(m)	Scenario 1 No Terrain	Scenario 1 With Terrain	Scenario 2 With Terrain
R13 Ladenford Cotts	347151	747123	0.6	1.8	1.1
R14 Ladenford	347110	747185	0.5	1.4	0.9

N.B. Units = OU_E/m³ 1-hour 98%ile

The assessment framework, which is based on Table 6 of the IAQM Guidance⁷, is set out in Table 3 below. On this basis, the predicted impact at your client's dwelling falls within the band of 1.5 - 3 OU_E/m³ 1-hour 98%ile and would be of Slight Adverse significance if terrain effects are discounted. Impacts are predicted to be of Negligible significance at Lour House where terrain effects are included. The results from my limited predictions indicate that impacts at Easter Meathie (R01 − R03) are likely to be of Moderate to Substantial Adverse.

Table 3 - Assessment Criteria (for moderately offensive odours)

Predicted Odour	Receptor Sensitivity		
	Low	Medium	High
≥10	Moderate	Substantial	Substantial
5-<10	Slight	Moderate	Moderate
3-<5	Negligible	Slight	Moderate
1.5-<3	Negligible	Negligible	Slight
0.5-<1.5	Negligible	Negligible	Negligible
<0.5	Negligible	Negligible	Negligible

N.B. Units = Odour OU_E/m³ 1-hour 98%ile annual

I do not have sufficient details on the existing ILU at Craignathro to include this in my dispersion model. Including the impacts from this and other ILUs in the area could be sufficient to cause the impact to be >3 OU_E/m³ 1-hour 98%ile at some additional receptors and thus be of Moderate Adverse significance.

Conclusions

The procedures used to predict dispersion from the horizontal fans has not been clearly stated and require further clarification and justification.

The proposed ventilation system, where odours are discharged from the side walls, is not best practice and is predicted to increase the odour impacts at odour sensitive receptors.

The apparent errors in the source terms used to calculate odour impacts mean that the odour impact assessment may not be relied upon to determine if the proposed installation is likely to affect amenity.

The combined impacts from the existing ILU and arrangements for the disposal of litter have not been sufficiently considered and have the potential to contribute to significant adverse odour impacts.

Kind regards

Steve Fraser BSc MPhil CEnv MIoA MCIWM

The Airshed Ltd, 5 Lauder Place, East Linton, East Lothian EH40 3DB
Tel: 01620 860529 www.theairshed.com mail@theairshed.com Registered in Scotland Company No. SC309129

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⁷ IAQM July 2018. Guidance on the assessment of odour for planning (version 1.1)

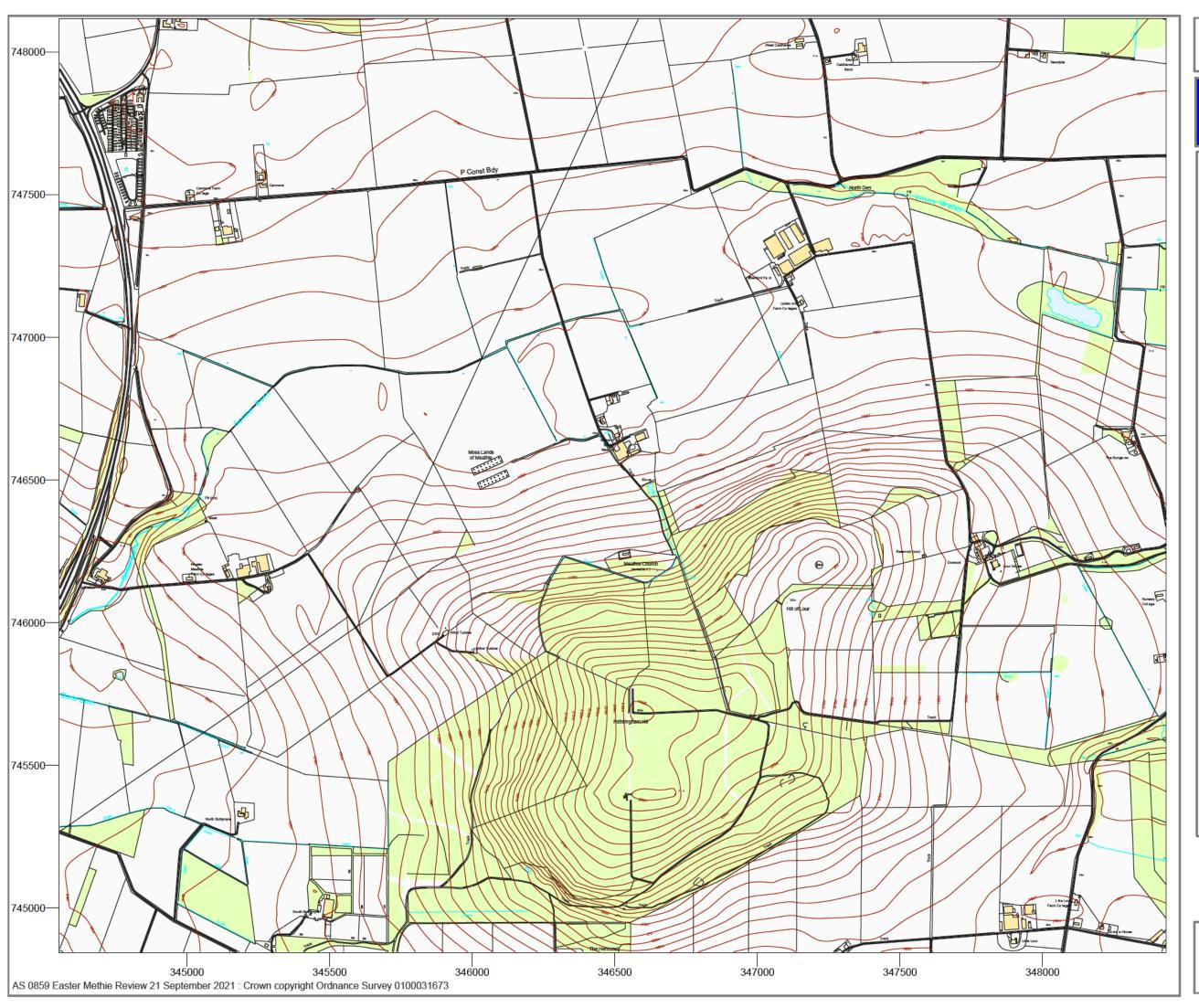
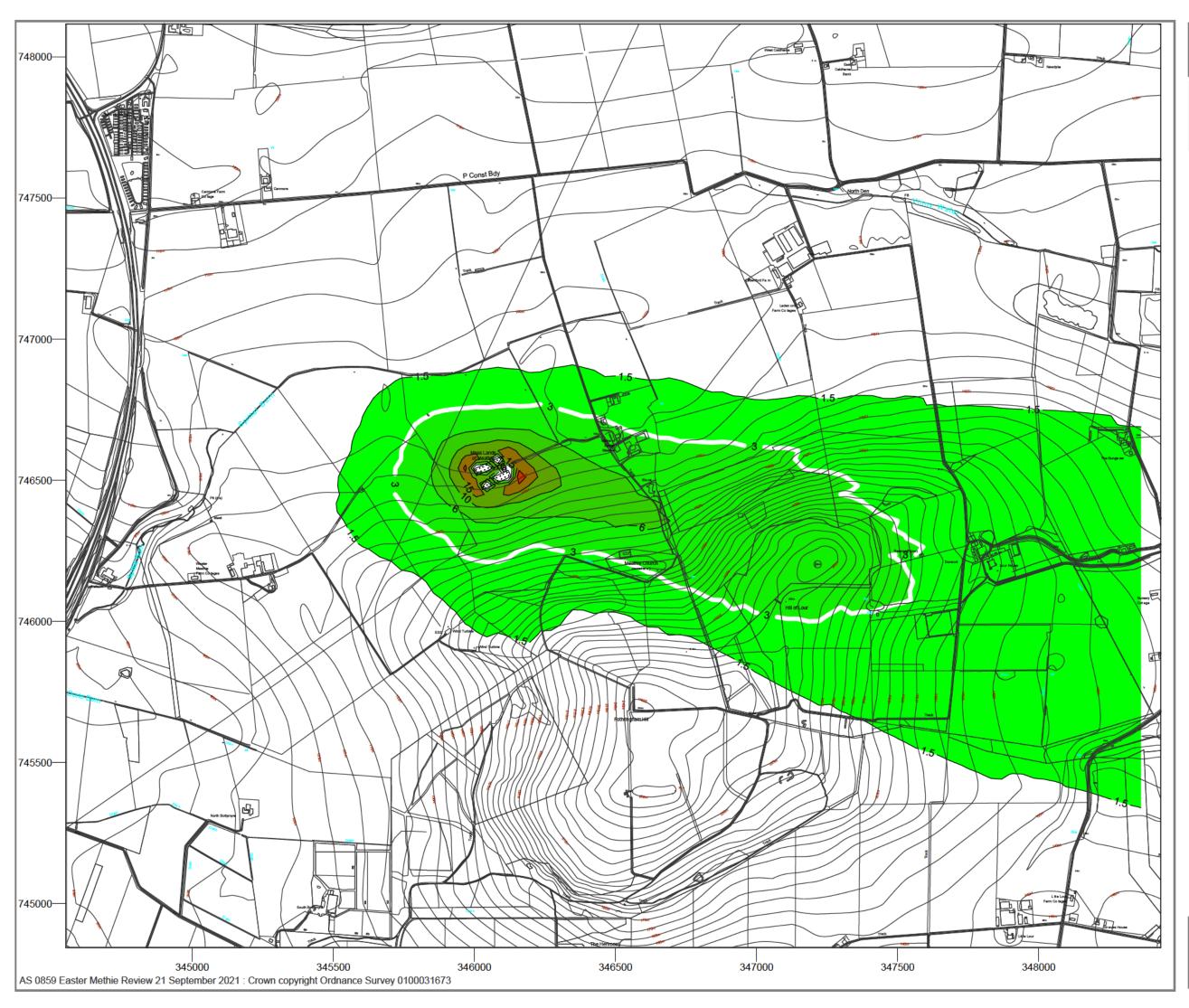




Figure 1





Predicted Odour

ADMS 5
Scenario 1
16 roof mounted fans per ILU
low eflux velocity
32,000 birds per ILU
no terrain
Suface roughness 0.3m
Minimum M-O 1m
Emissions rate
SCAIL 1.4 OUE/s/bird
steady state
no temporal variation
Met Data Leuchars 2016
Prediction Grid ~30m intervals
Receptor Height 1.5m
Contours = OU_E/m³ 98%ile 1 hour
Benchmark 3 OU_E/m³ 98%ile

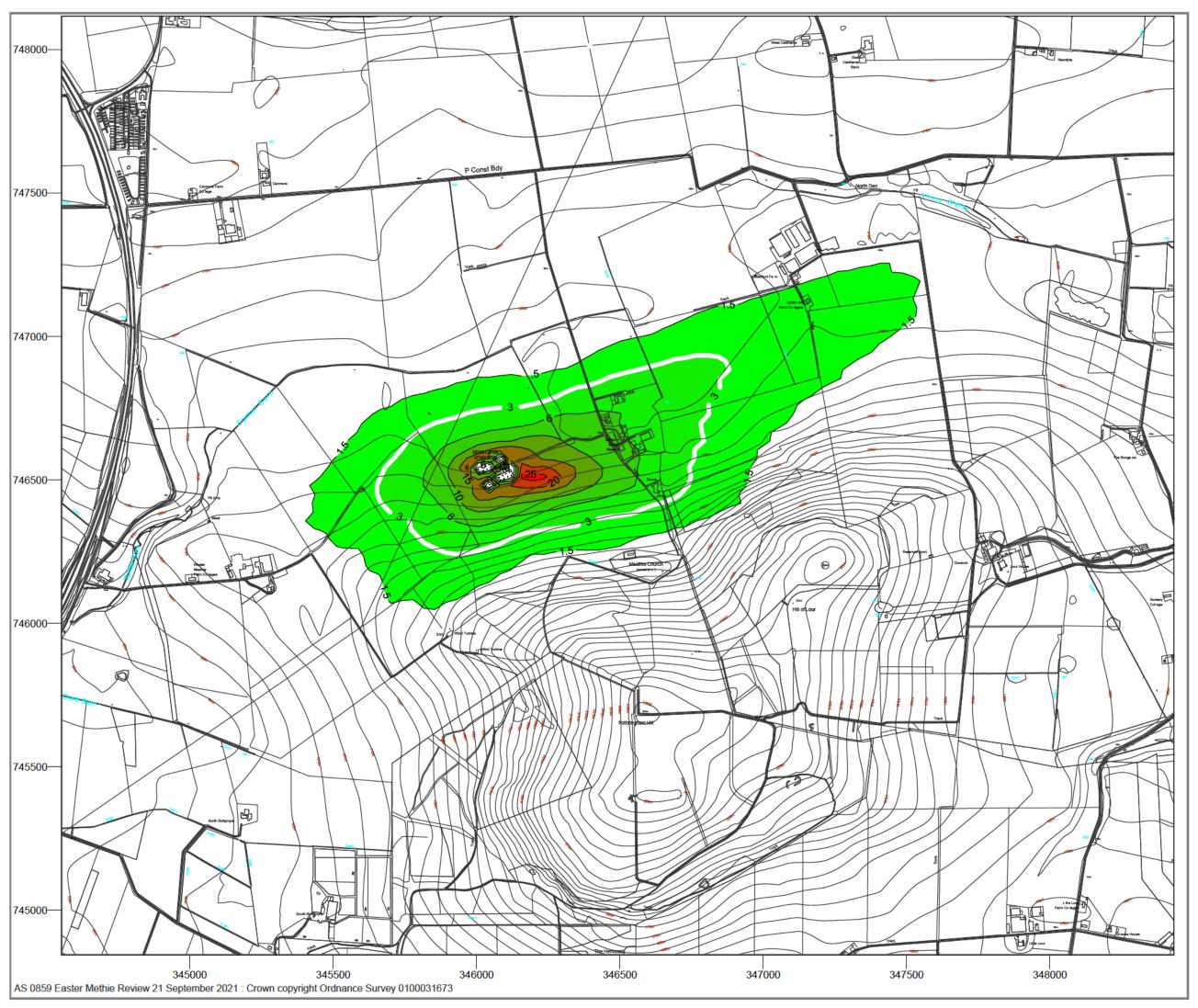


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Predicted Odour

ADMS 5
Scenario 1
16 roof mounted fans per ILU
low eflux velocity
32,000 birds per ILU
includes terrain
Suface roughness 0.3m
Minimum M-O 1m
Emissions rate
SCAIL 1.4 OUE/s/bird
steady state
no temporal variation
Met Data Leuchars 2016
Prediction Grid ~30m intervals
Receptor Height 1.5m
Contours = OU_E/m³ 98%ile 1 hour
Benchmark 3 OU_E/m³ 98%ile

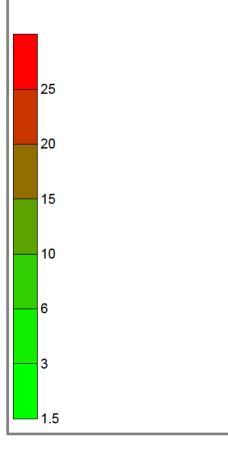
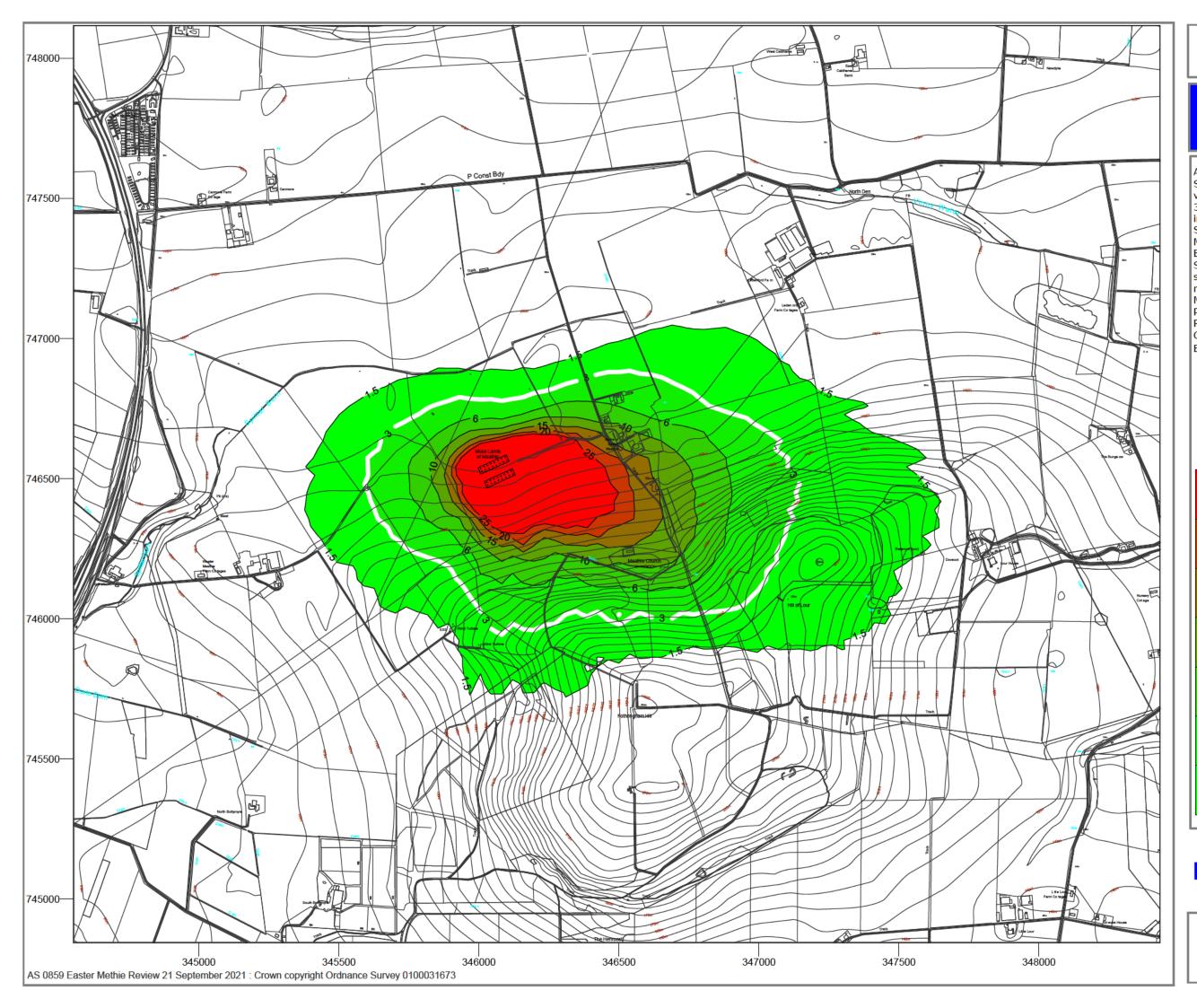


Figure 2.2





Predicted Odour

ADMS 5
Scenario 2
volume release
32,000 birds per ILU
includes terrain
Suface roughness 0.3m
Minimum M-O 1m
Emissions rate
SCAIL 1.4 OUE/s/bird
steady state
no temporal variation
Met Data Leuchars 2016
Prediction Grid ~30m intervals
Receptor Height 1.5m
Contours = OU_E/m³ 98%ile 1 hour
Benchmark 3 OU_E/m³ 98%ile

Figure 3

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Receptor name	X(m)	Y(m)	Z(m)		LTC	P10	P 9.
R01 Easter Meathie	346451	746708	1.5	4	0.4	18.2	3.2
R02 Easter Meathie	346500	746652	1.5		0.6	18.9	3.5
R03 Easter Meathie	346481	746779	1.5	4	0.3	17.6	2.2
R04 Wester Meathie	345151	746177	1.5		0.1	8.6	0.6
R05 Wester Meathie	345026		1.5		0.1	8.4	0.5
R06 Spittalburn	344700	746138	1.5		0.0	7.2	0.3
R07 North Bothymyre	345191	745323	1.5	1 1	0.0	9.8	0.2
R08 South Bothymyre	345285	744881	1.5	4	0.0	5.9	0.2
R09 west of Lour	347265	744865	1.5	4	0.0	5.1	0.3
R10 Little Lour	347879	744877	1.5	4	0.0	4.1	0.5
R11 Little Lour	348105	745021	1.5		0.0	4.2	0.8
R12 Lour House	347764	746217	1.5	4	0.1	6.9	2.7
R13 ladenford Cotts	347151	747123	1.5		0.1	8.2	0.6
R14 Ladenford	347110	747185	1.5		0.1	8.4	0.5
				1	İ		2 - 1
max						18.9	3.5

Scenario 1
16 vertical roof mounted fans on each ILU 2m above roof ridge
Met data Leuchars 2016
minimum M-O 1.0m
surface roughness 0.3m
efflux velocity 2m/s
emission rate 1.4 OUE/s / bird
exhaust temperature 20oC
terain effects discounted

					e/m3 OUE <all sources=""> - 1hr</all>	P100.00 ou_e/m3 OUE <all sources=""> - 1hr</all>	P 98.00 ou_e/m3 OUE <all sources=""> - 1hr</all>
Receptor name	X(m)	Y(m)	Z(m)		LTConc ou_e/	P100.00 ou_e	P 98.00 ou_e,
DO4 Fasta a Masthia	246454	746700	4.5	1 1	0.0	17.0	6.0
R01 Easter Meathie	346451	746708	1.5		0.9	17.9	6.8
R02 Easter Meathie	346500	746652	1.5		0.9	14.3	6.3
R03 Easter Meathie	346481	746779	1.5		0.6	14.0	5.1
R04 Wester Meathie	345151 345026	746177 746171	1.5 1.5		0.1	7.5 5.9	0.8 0.7
R05 Wester Meathie R06 Spittalburn	344700	746171	1.5		0.0	3.8	0.7
R07 North Bothymyre	345191	745323	1.5		0.0	3.4	0.3
R08 South Bothymyre	345285	743323	1.5		0.0	2.3	0.3
R09 west of Lour	347265	744865	1.5		0.0	1.3	0.2
R10 Little Lour	347879	744877	1.5		0.0	1.0	0.1
R11 Little Lour	348105	745021	1.5		0.0	0.9	0.2
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R14 Ladenford	347110		1.5		0.1	4.3	1.4
max]		17.9	6.8

Scenario 1
16 vertical roof mounted fans on each ILU 2m above roof ridge
Met data Leuchars 2016
minimum M-O 1.0m
surface roughness 0.3m
efflux velocity 2m/s
emission rate 1.4 OUE/s / bird
exhaust temperature 20oC
terain effects included

					1hr	1hr	1hr
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Receptor name	X(m)	Y(m)	Z(m)	Į		۵	Ь
R01 Easter Meathie	346451	746708	1.5	Ī	1.1	29.2	9.4
R02 Easter Meathie	346500	746652	1.5	ı	1.3	27.6	12.7
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R06 Spittalburn	344700	746138	1.5		0.0	4.7	0.5
R07 North Bothymyre	345191	745323	1.5		0.0	4.4	0.3
R08 South Bothymyre	345285	744881	1.5		0.0	3.0	0.2
R09 west of Lour	347265	744865	1.5		0.0	2.3	0.3
R10 Little Lour	347879	744877	1.5		0.0	1.6	0.2
R11 Little Lour	348105	745021	1.5		0.0	1.5	0.3
R12 Lour House	347764	746217	1.5		0.1	3.4	1.3
R13 ladenford Cotts	347151	747123	1.5		0.1	5.8	1.1
R14 Ladenford	347110	747185	1.5	Į	0.1	6.4	0.9
						20.0	40 =
max						29.2	12.7

Scenario 2
volume releases
Met data Leuchars 2016
minimum M-O 1.0m
surface roughness 0.3m
netutral buoyancy
emission rate 1.4 OUE/s / bird
terain effects included

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Miss Kirsty Cameron

Address: 8 Helen Street Forfar DD8 2HW

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposal is in a scenic corner of rural Angus and is highly visible, exposed position

set against the backdrop of Fotheringham Hill.

the sheds will generate harmful air borne particulates, odour, noise and light pollution impacting on the local residents at Easter and Wester Meathie, Loclands Park, on mosside Rd and at Ladenford. The nearest house is onlt 350 metres downwind from proposed sheds.

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Case Officer: Ruari Kelly

Customer Details

Name: Mrs Tessa McLellan

Address: Nevay House Manor Street Forfar DD8 1BQ

Comment Details

Commenter Type: Member of Public

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: I whole heartedly support the applicant in the venture.

I regularly walk in this area, including past their existing site at Craignathro. This I have found to be very well maintained & their eggs are top quality.

I have never found the odour to be any worse than any other agricultural site, often better than many.

I believe this venture will only bring in more employment & supply a great product locally saving on more food miles.

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Case Officer: Ruari Kelly

Customer Details

Name: Mr K G

Address: 144 Dundee loan Forfar Dd8 1eb

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The sheds will generate harmful air-borne particulate pollution, foul odours, noise and light pollution severely impacting on the health and wellbeing of residents located only 350 mtrs downwind of the sheds

Lorries servicing the site will pass directly in front of neighbours' houses with all the consequent disruption, noise and pollution

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Case Officer: Ruari Kelly

Customer Details

Name: Miss R G

Address: 144 Dundee Ioan Forfar Dd81eb

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I object to the building of this hen shed due to it being so inhumane to the chickens to be crammed in together like that. It's not free range at all. Also this will end up polluting the burn nearby and it's on a flood plane which nobody can really tell how high it will flood each time which is not only a risk to the animals but everyone nearby due to the sewage left behind from the animals. Also the smell is another reason.

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: John Bingham

Address: Dundee road Angus Dd8 1ec

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Don't need no more chicken farms around here,

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Miss Claire Crighton

Address: Caldhamebank farm cottage Lour Forfar Dd8 2lg

Comment Details

Commenter Type: Community Council

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Strongly against the building of another battery hen business.. I thought we were trying to close these hell holes not promote them. It will destroy acres of ground and be an utter eye sore, the smell is horrendous.. nobody wants this on their door step, no thanks

Application Summary

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landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Brian Mulraine

Address: 84 Dunnichen Ave. Gowanbank Forfar DD8 2EJ

Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I strenuously object to the prospect of such a proposal not only at the suggested site but anywhere in the county. Further more I object not just on the grounds of it holding the potential to spoiling the local scenery and possibly contaminate the surrounding environment I object to such a proposal on ethical grounds. This is not the way the supply of eggs or any other such domestic produce ought to be undertaken and if that means such produce will eventually become more expensive or not so readily available then so be it. We must draw a line at the potential suffering of any animal life to feed our greed driven pleasure and convenience.

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including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Darlene Hay

Address: 114 Threewells Drive Forfar DD8 1EP

Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Cruelty to the birds

Smell and pollution

Unlikely to improve outlook on the scenery/ landscape

Application Summary

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including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Scott Couper

Address: 11 Dunnichen Road Kingsmuir DD82RQ

Comment Details

Commenter Type: Miscellaneous

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I strongly object to these plans due to potential harmful effects ranging from odour,

landscape destruction, more dangerous speeding farm traffic, etc.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Brian Batson

Address: 7-9 Lour Road Forfar DD8 2AS

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I object on the the following which are contrary to the Angus Local development plan.

- The development is industrial and out of keeping with the the rural nature of the area.
- The industrial unit would remove land from agricultural production
- The industrial untists will produce harmful airborne pollution to those living locally
- the dangers of run off pollution from the site
- Access problems with large vehicles on rural roads.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Frances Martin

Address: 18 Kinnordy Avenue Kirriemuir DD8 4JP

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This proposal would place 2 large industrial units in a rural area which is against

planning ethos.

Such units are very smelly - as was the chicken farm in Northmuir, Kirriemuir. This means they are environmentally unfriendly. There is also the possibility of attracting rats.

The Forfar Pathway network is used by many from outside Forfar, including the Walkers Group to which I belong. The units would be unsightly and unpleasant for all those passing near the site.

For these reasons I object to the proposal.

Application Summary

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Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure

including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Lisa Wood

Address: 4 Braeside Cottages Lethen Nairn IV12 5QJ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: Sounds awful for the chickens and for the currently unspoilt beauty of the land.

Application Summary

Application Number: 21/00602/FULM

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Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Dr Peter Cargill

Address: 27 Hillside Rd Forfar DD82AX

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: There should be no doubt in the mind of councillors that this industrial development is entirely innappropriate for its rural location. It does not "protect the quality of the landscape", "protect or enhance open spaces", and is not "of a scale appropriate for its location": quotes from local development plan.

Other than the hideous egg factory already erected by these applicants to the north of this application, the view from Balmashannar and the roads to the south of it is tranquil and rural. I speak as a regular walker on these roads and paths. Also, having watched the collection lorries make their way to the current facility, an "interesting" operation, three times as many heavy vehicles on these roads should not be tolerated.

The current factory is deeply unpleasant (not just for the hens), but for local residents, and the last thing rural Angus needs is another such operation on a greater scale.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Miss Claire Ellis

Address: 12 Robert Street Forfar DD83DG

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I object to the proposed intensive egg production unit (IPU) at Easter Meathie Farm. I object on the basis this proposal is in a scenic corner of rural Angus and is highly visible,

exposed position set against the backdrop of Fothringham Hill and the hill of Lour.

I also object on the basis that the sheds will generate harmful airborne particles, odour, noise and light pollution as the sheds will result in 96,000 birds within a small rural area. Bearing this in mind the nearest house is only 350 metres downwind from the proposed sheds.

Thank you for your time.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Ms Marilyn Lees

Address: 44 Fruithill Forfar DD8 1JT

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I do not think massive sheds containing 64,000 hens should be allowed. I think this is morally wrong How can they possibly be "free range" hens. I actually think this is animal cruelty. In my opinion massive industrial sheds in a rural area and animal cruelty should not be allowed.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure

including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs C Logan

Address: 4 Dundee roadl Forfar Dd8 1hr

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Due to health issues and pollution

Visualisation Assessments

Conformance and Technical Assessment of the Applicant's Photomontage Visualisations for the Mains of Easter Meathie Application – Reference: 21/00602/FULM.

This assessment has been requested by Lour Farms, the neighbouring estate, and local residents. It has been carried out following a site visit and a review of the planning documentation and the visualisations submitted.

Background:

Diana Royce acts as an independent expert consultant on the visualisation of developments submitted as part of a planning application. As Production Director of Architech Animation Studios for 20 years, she has considerable expertise in the technical standards required to provide reliable and verifiable visual representations. The company was noted for their research into the realistic representation of wind energy projects, the University of Stirling landscape study on focal lengths, and the technical assessment and conformance of photomontage visualisations submitted to the planning process. The company was dissolved in 2018.

As consultants to The Highland Council, Architech created and updated the council's Visualisation Standards for Wind Energy Developments (The Highland Council Standards) which have been adopted by many local authorities across the UK and which brought about the revision of the SNH Visual Representation of Wind Farms - 2014 & 2017 (SNH Guidance) and the more recently updated Landscape Institute Technical Guidance Note 06/19 (LI Guidance 06/19). The late principal of Architech, Alan Macdonald, was also the author of the only publication on this subject, Windfarm Visualisation – Perspective or Perception? (2012).

Photomontage visualisations are an important part of any Landscape and Visual Impact Assessment (LVIA) as they are the only readily accessible representations for the general public and local residents. The public, planners and all decision makers need to have confidence in the reliability of what is presented to them to ensure that well informed and sound decisions can be made.

Visualisation Guidance:

The below Standards and Guidance on the subject established the technical requirements for the production of photomontage visualisations to create consistency and greater reliability of representation of the scale and proximity of proposed developments within the landscape. The required standards allow for verification through fixed parameters and the inspection of photographic metadata to confirm the use of acceptable camera formats and lenses and the correct geometry in the photomontage process.

The accuracy of visualisations was the subject of considerable controversy in the early applications for wind farms and power infrastructure projects. As a consequence, extensive research has been undertaken in the last decade to improve the trustworthiness and realism of all photomontage visualisation within the planning process. The following guidance on the subject now provides the basis of much improved standards and best practice in the production of visualisations in which many of the technical fundamentals have become mandatory.

- Visualisation Standards for Wind Energy Developments (2016 Update) The Highland Council
- Visual Representation of Windfarms (2017) Scottish Natural Heritage (SNH)
- Visual Representation of Development Proposals Landscape Institute Technical Guidance Note 06/19

The applicant has cited the Landscape Institute Technical Guidance Note 06/19 (LI Guidance 06/19) as the basis for the production of their photomontage visualisations (7.2). However, in the applicant's visualisation methodology (7.3.4) it is stated that the photography was undertaken in accordance with the Landscape Institute Technical Guidance Note 01/11 (LI Guidance 01/11), and in the footnote, they note that this Guidance has been superseded by the LI Guidance 06/19. The photography was undertaken six months after the publication of the new LI Guidance 06/19 and the withdrawal and supersedure of the very outdated LI Guidance 01/11. It is not acceptable for an applicant to avoid the required standards by arbitrarily deciding which Guidance should be applied.

Viewpoint Selection:

The viewpoints selected for assessment within any LVIA are important because they will influence the conclusions reached by landscape professionals. The applicant for the Easter Meathie proposals has provided 3 viewpoints (Appendices 7.3 - 7.8), for an application for the erection of two large parallel intensive units with a capacity for 64,000 hens for egg production, with ventilation flues, feed silos, an integral packing unit, forage ranges and associated access infrastructure.

It is understood from the LVIA text (7.3.1) that the final included viewpoints were agreed with Angus Council's Countryside Officer. For a major development of this scale, in such an exposed position within an enclosed scenic envelope, more viewpoints are necessary to fully assess the impact of the proposed development, which if approved, will become a central focus particularly in views from the north. Residents are left to question how familiar the Countryside Officer is with this particular locality and whether as part of the consultation a visit was made to the area to consider the issue?

The rising ground to the north which will have a full view of the proposed development has not been represented. There are a number of considerations in this area. Near the top of the hill, before the bend at Craignathro Farm, a row of residential cottages will have a cumulative view of both the existing unit and the larger proposed unit. This road also forms part of the well-used Forfar Path Network and Circuit of Lour which is recommended for cyclists. A suggested additional viewpoint half way up the road is shown in Appendix 1.

The Computer Model of the Development:

The methodology given for the visualisations (7.3.4) indicates that SketchUp was used for the model which while a suitable and easy resource for rough preliminary modelling is not suitable for photomontages submitted to the planning system as part of an Environmental Impact Assessment for a major development. The model lacks any real detail, any idea of the external building materials, any natural lighting or indeed the final colours of the finished structure. As a result, it appears in the photomontages as an amorphous black shape which does not give the public, planners or decision makers anything approaching a true understanding of how the structure will appear in the landscape.

The only indication given of colour is that the structure will be in a recessive colour to blend into surrounding farmland and woodland (3.2). More detail is required to make any proper assessment and the very dark almost black heat-absorbing colouring used on the model does not seem plausible or sensible for this type of intensive poultry unit. The colours in farmland and woodland change through the seasons and it is difficult to escape the conclusion that the colouring in the photomontages has been conveniently tailored to recede into the gloom of the submitted photographic views. Close-up Examples of the photomontaged model are shown in Appendix 2.

There are also a number of obvious inconsistencies in metallic colouration of the vent flues and silos between the three images. In the viewpoint from Mosside Road the batter linking the raised site base with the existing track is not shown yet it seems unlikely that this extended earth work will not be visible from this aspect. The model in the overview from Meathie Church appears somewhat skewed and lopsided in the photomontage.

The only local reference we have for what the proposed units may look like in reality is the existing smaller poultry unit at Craignathro Farm which is shown in Appendix 3.

The photovoltaic panels which are planned for the south facing roofs of each shed (3.1) are not shown on any of the drawings, on the computer model or in the photomontages which is a major omission as they can be quite distinctive features and very reflective in certain light conditions.

The model used for this development is therefore of a very low standard and the lack of detail, colouring and missing elements fail to provide an adequate impression of the proposed development in situ.

Photography:

All the relevant and current Guidance and Standards clearly state that good quality imagery should be secured in good weather conditions with an emphasis on good visibility. The LI Guidance 06/19 specifies that baseline photography should be based on good quality imagery, secured in good, clear weather conditions wherever reasonably possible (2.2). The Highland Council Standards (2.11 & 12) demand clear sunny weather conditions in good visibility to show a worst-case scenario in all cases because it is in these conditions that we most appreciate our landscape. The SNH Guidance similarly requires good visibility, clear skies and clear air to allow for sufficient contrast between the different elements in the landscape. (110 & 111). There is recognition that in some instances difficult weather conditions may occur within a tight timetable, however with adequate time and skill most photographers who undertake this work can produce a series of images which can easily fulfil these requirements.

The photographic imagery submitted by the applicant is very low quality and has not been secured in good clear weather conditions resulting in images that are extremely dark with unacceptably low levels of visibility. In consequence the three viewpoints do not provide a proper representation of the quality of the surrounding landscape, nor a clear impression of how the development will appear within it. The photographs were all taken on 10th December 2020, the darkest and gloomiest time of year, and since that time the applicant has had adequate time and opportunity, regardless of any Covid-19 restrictions, to undertake more acceptable photography at a more suitable time of year and in weather conditions which comply with Guidance. They have not done so, and the current imagery should not be accepted by the Planning Authority. Comparative reference photographic imagery is shown in Appendices 4-1, 4-2, 4-3.

The camera equipment used, namely a Sony A7 is a high quality full-frame digital camera with a fixed 50mm lens, complies fully with Guidance requirements. This camera has a particular reputation for the power and quality of its full frame sensor, so the poor quality of the images submitted therefore does not relate to the equipment used.

The standard of photography does not meet the required representative quality and was not taken in the weather conditions specified in the LI Guidance 06/19, SNH Guidance or The Highland Council Standards for the production of photomontage visualisations.

Presentation:

The three viewpoints (Appendices 7.3-7.8) are presented in the form of a baseline photograph with wireline below and a 50mm single frame photomontage on an A3 page with an image size of approximately 390mm x 260mm. The baseline image is a 50mm image cropped top and bottom rather than the usual wider panoramic image which can be more useful for landscape impact evaluation. In this instance the purpose of the images is limited to baseline comparison with the visibility and scale of the development on the site. The presentation style is simple and uncomplicated and complies with basic requirements for this type of development however the purpose is severely compromised by the quality of the modelling, photomontaging and photography described above.

The viewpoint locations are given in Appendix 7.1, entitled Viewpoints with ZTV overlay. The scale of this map does not allow for the exact positioning of the viewpoints which is not helpful for those wishing to use the visualisations on site. The view from Meathie Church (Appendix 7.7/7.8) is certainly not taken from the position shown. More detailed inset viewpoint maps are recommended in LI Guidance 06/19. It is accepted that insets would not suit the chosen presentation format, but a more detailed larger scale viewpoint location map should have been provided.

The section in the LVIA describing the production of the visualisations (7.3.4) does not meet the requirements of the Technical Methodology requirements in the LI Guidance 06/19 (Appendix 10) and the information given below the images is not as detailed as it should be. In particular a 'Recommended viewing 500mm at A3 with both eyes' stated on the images has long been replaced by 'To be viewed at comfortable arms-length' which is stipulated in the LI Guidance 06/19 (3.8.3) and all other visualisation Guidance & Standards.

In ideal circumstances it is recommended that all visualisations should be used at the viewpoint within the surrounding landscape where any discrepancies quickly become evident. However, with the advent of e-planning and the ever-increasing bulk and expense of Environmental Impact Assessment documents, visualisations are increasingly viewed digitally. As a result of the COVID-19 restrictions this digital viewing process has now been accelerated and all application documents are currently only accessible to the public in a digital form. The accurate scaling provisions built into the printing of visualisations has therefore been negated and viewing visualisations on computer screens of various sizes via phones, tablets, laptops or fixed computers leads inevitably to an in-built underestimation of the scale of the development.

As a result of these potentially misleading viewing conditions, all Guidance and Standards now recommend the provision of photomontages at 50mm and 75mm focal lengths for Visual Impact Assessment (VIA). In the Highland Council Standards this approach is mandatory, in the LI Guidance 06/19 it is called 150% enlargement and is recommended in many circumstances and discussed at length in 3.8.5 to 3.8.13, in the SNH Guidance this approach for single frames is optional (189-196) but panoramic photomontages are now cropped to the vertical field of view of a 75mm lens as standard. It is acknowledged following the work undertaken by The Highland Council and the University of Stirling study that while the 50mm lens may equate to the field of view of acute human vision, it does not accurately represent scale and distance within the image. It is now recognised in all Guidance that a 75mm equivalent or a 150% enlargement of a 50mm single frame image is more accurately representative of the scale of a development and its distance from the viewpoint.

The visualisations therefore also fail in terms of providing the public, planners and decision makers with any real sense of the scale of the proposed Easter Meathie development within the landscape. On site viewing of the images from each of the selected viewpoints will confirm that it will be larger and significantly nearer in reality.

Summary:

It is evident that the applicant has not provided the public or decision-makers with a reliable set of visualisations for the proposed development at Easter Meathie, and that although applicable Guidance has been cited by the applicant, the most basic tenets have been disregarded.

The EIA process which is outlined in the main text (6.1) highlights the need to ensure that the predicted effects of the development are fully understood by the public and the relevant competent authority before a decision is made. This principle has not been met by the applicant. The visualisations, which are vitally important, do not provide enough reliable information to ensure a proper understanding of the predicted visual effects of what is proposed at Easter Meathie.

The best views across the area and selected site on the rising ground to the north have been omitted. This is also an area regularly used by walkers and cyclists and forms part of the Forfar Path Network.

Remedy and recommendation: To require the Applicant to provide a further viewpoint from a clear point about half way up the unnamed roadway to the south of Craignathro Farm.

The very low standard and lack of detail in the computer model in combination with photography of such poor quality in totally unacceptable weather conditions in the dark days of December has created a set of images which, in my view, are totally unrepresentative and misleading. These flawed fundamentals have resulted in showing the host landscape in a totally unfavourable light and the scale of the development is not accurately portrayed because of the limitations of the 50mm lens.

Remedy and recommendation: To require the Applicant to re-photograph all the viewpoints in suitable weather conditions to comply with guidance, to apply detail, material texture, PV panels, appropriate lighting and more realistic colouring to the model before re-montaging. To supply in addition to the 50mm single frame image, a 75mm equivalent (150% enlargement) recalibrated single-frame image to provide views with accurate scale and distance.

There are too many obvious shortcomings in this visual submission to have confidence that the visualisations submitted by the Applicant meet the standard of reliability required by all planning systems. It is clear that they do not conform to the LI Guidance 06/19 which is cited. The Applicant gives an impression of compliance which is not borne out and completely fails the Landscape Institute's principle test for visualisations "that they should provide the viewer with a fair representation of what would be likely to be seen if the proposed development is implemented and should portray the proposal in scale with its surroundings. In the context of landscape/townscape and visual impact assessment, it is crucial that visualisations are objective and sufficiently accurate for the task in hand. In short visualisation should be fit for purpose." For a proposed development of this scale, which is being considered by the local authority, the visualisations reviewed are not fit for purpose.



Diana Royce 11th October 2021

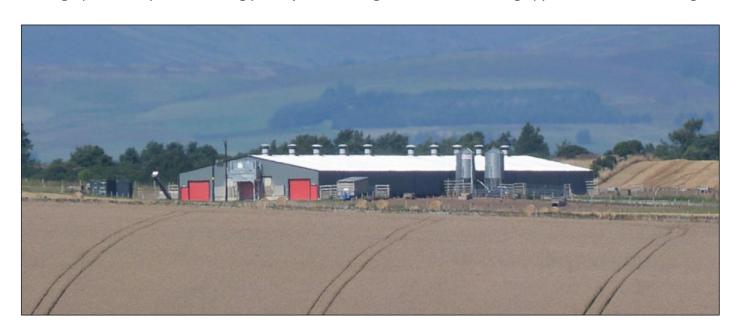
Appendix 1

Approximate location of additional viewpoint on road up to Craignathro Farm/ Forfar Path Network



Applicant's Photomontage Computer Model Close-ups					
	Consent to reproduce the Applicant's images of their Computer Model has been withheld.				
	Consent to reproduce the Applicant's images of their Computer Model has been withheld.				
	Consent to reproduce the Applicant's images of their Computer Model has been withheld.				

Photographic examples of existing poultry unit on Caignathro Farm showing appearance and colouring.







Baseline photographic comparisons between Applicant's viewpoint photographs and a similar photograph taken in acceptable weather conditions and visibility.

1. Appendix 7.4 – Mosside Road

Consent to reproduce the Applicant's viewpoint photographs for comparison purposes has been withheld.



(please note that the similar photographs are for visual reference only, they have not been taken with a 50m lens so display some distortion and compression of vertical scale)

Baseline photographic comparisons between Applicant's viewpoint photographs and a similar photograph taken in acceptable weather conditions and visibility.

2. Appendix 7.6 – Easter Meathie Farmhouse

Consent to reproduce the Applicant's viewpoint photographs for comparison purposes has been withheld.



(please note that the similar photographs are for visual reference only, they have not been taken with a 50m lens so display some distortion and compression of vertical scale)

Baseline photographic comparisons between Applicant's viewpoint photographs and a similar photograph taken in acceptable weather conditions and visibility.

3. Appendix 7.8 – Meathie Church

Consent to reproduce the Applicant's viewpoint photographs for comparison purposes has been withheld.



(please note that the similar photographs are for visual reference only, they have not been taken with a 50m lens so display some distortion and compression of vertical scale)

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Kenneth Ayre

Address: 45 Gallowshade Road Forfar DD8 1NA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: am objecting to this application/proposal on the following grounds, =

some of my concerns are,

the sheds will be in classic, open Angus countryside and will be visible for miles

the site is industrial in nature and is out of character with the rural location

it takes prime farmland out of production, replacing it with sheds producing greenhouse gases

there are pollution and health issues particularly for residents who live within 415 mtrs of the sheds

the sheds' base covers an area greater than Forfar Athletic's ground at Station Park

there is a significant risk of flooding and pollution of local waterways

it will triple the concentration of such sheds (96,000 birds) in a very small rural area

the stink already evident when the current single shed is cleaned is disgusting and offensive

increased heavy traffic on narrow roads will be hazardous for residents and locals

there are damaging long-term environmental impacts

the loss of amenity will be substantial for the nearby houses, locals and visitors alike if this application is approved it will lead to many more such applications in rural areas.

please do not allow this to go ahead as there is no real or tangible benefit to the area or local community.

Application Summary

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Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Ms H McCallin

Address: Brechin Road Forfar DD8 3JS

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:- These are not free-range hens but hens kept in sheds for intensive egg production.

- We are very aware of the negative impact intensive farming has on the animals themselves, as well as the environment (not good when we are in a climate crisis which Scotland has declared).
- The local roads are not designed for the increase in heavy vehicle traffic which will cause pollution and be hazardous to both residents and visitors.
- Should be supporting local farmers not large scale industrial intensive egg production.
- In fields which are known to flood, the site will require complex drainage and foul water management which cannot be relied on to prevent foul water run-off and pollution to both land and waterways. Again, not appropriate when in a climate and biodiversity crisis.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Wilma Gordon

Address: 15 Westfield Gardens Forfar DD8 1HN

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The development is industrial in nature and does not fit with the existing traditional clusters of farm buildings. The proposed development area will remove 113 acres of prime agricultural land from cultivation and will be of little economic benefit to our community.

This proposal takes some of the country's best farmland out of production, replacing it with sheds producing greenhouse gases and other pollutants. These large industrial sheds will be visible for miles around and are of a scale which is totally out of character in this rural setting. The sheds are too close to neighbouring houses which will be blighted by air-borne pollution, smells, noise, increased heavy traffic, rats and flying insects. The fields are prone to flooding and this risk will be increased due to the building work with the danger of polluting the burn running through the property.

There are already 32,000 hens within 2km and this proposal will increase this to 96,000 hens, which will completely change the rural nature of the area.

The local roads will not take the increase in lorry traffic and will become more hazardous for drivers, cyclists and walkers enjoying the countryside.

The application contravenes the principles of the Angus Local Development Plan which commits the Council to protect the environment and landscape for all.

This proposal is against the Angus Local Development Plan policies DS1, DS3, DS4, PV2, PV6, PV12, PV14 and PV20.

All this disruption will have little economic benefit for the community. Few jobs will be created, feed will be imported and the eggs shipped to other parts of the country. An independent report for the British Free Range Egg Producers Association warned against the expansion of this sector as further expansion of capacity would lead to over-supply, reduced profits, if any, and eventually empty sheds.



OUR REF B5383.8/HAL YOUR REF 7 October 2021

The Planning Department Angus Council Orchardbank Business Park Forfar Angus DD8 1AN

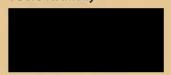
Dear Sirs

Mr Andrew Brown Letter of Observations in respect of Planning Application 21/00602/FULN

We act on behalf of Mr Andrew Brown who has asked us to submit the enclosed letter and plan to be treated as a supplementary letter to the letter he has already lodged with yourselves concerning the above Planning Application. The second letter supplements the information concerning drainage at the site. Mr Brown has a particular insight because of his long history of farming at Easter Meathie.

Please acknowledge safe receipt.

Yours faithfully

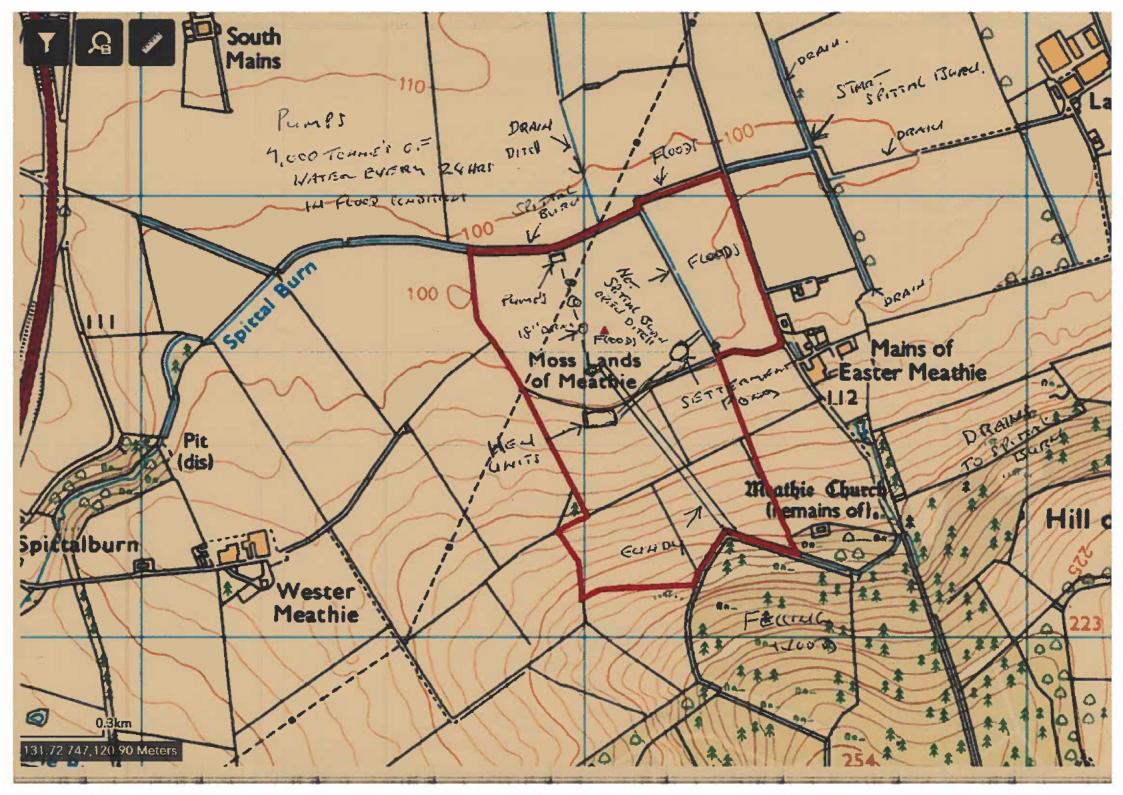


Hamish Lean
For and on behalf of Shepherd and Wedderburn LLP
hamish.lean@shepwedd.com
T 01224 343 551
Accredited by the Law Society of Scotland as a Specialist in Agricultural Law

Commercial House 2 Rubisiaw Terrace Aberdeen AB10 1XE DX AB103 Aberdeen 1 T+44 (0)1224 621 166 F+44 (0)1224 623 103 5th Floor, 1 Exchange Crescent Conference Square Edinburgh EH3 8UL DX 551970 Edinburgh 53 T +44 (0)131 228 9900 F +44 (0)131 228 1222

1 West Regent Street Glasgow G2 1RW DX GW409 Glasgow T +44 (0)141 566 9900 F +44 (0)141 565 1222 Octagon Point 5 Cheapside London EC2V 6AA DX 98845 Cheapside 2 T +44 (0)20 7429 4900 F +44 (0)20 7329 5939 The water from the Units and the Seltlement Ponds goes ite en open dett - thes then goes into the Spittal Burn. The Sputtal Bungues through to Lederland lend to draw the land up to hadenford steading and the Woods above. Approx, 1000 acres draw into Speltel Burn before it leaves Easter Meather lend, as this Is very / let lend, Spulted Bon over/ lows in blood conditions. also the open draw while they are drawing into overflows

Out present the land whose the settlement poind is drawed with growthed draws which go to the My bist letter with the two maps quies full details of the dramage on the form where the her with are Yours laitefully,



Planning Department,
Angus Council,
Angus House,
Orchardbank Business Park,
Forfar
DD8 1AN

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure as set out in the application noted above.

As a member of two walking groups who frequently walk round this area, it would be a shame to see more units built on this lovely bit of open country side.

I sympathise with anyone living in the area as having once owned a property near a hen unit and when the wind was in the wrong direction the smell was awful and you couldn't have the clost or windows open.

Signed:

Name:

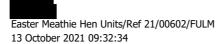
LINDA M. FORBES

Address:

SIPLAW VIEW
WESTBANK
WESTMUIR
KIRRIEMUIR
DD85LR.

Date:





Dear Sir or Madam

I have recently read about the planning application for the construction of a proposed intensive egg production unit at Easter Meathie Farm.

I totally object to this industrial unit being constructed at this site for many reasons:

The adverse visual impact on an extremely scenic part of Angus

The pollution

The increased heavy traffic in the area

The increased risk of flooding

The removal of prime agricultural from cultivation

I am totally opposed also to battery farming and these units will be used to house chickens and hens in an extremely cruel environment. This kind of farming should NOT be encouraged

With regards

Chloe Shand Hillside Road Forfar Air pollution

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr John Harrison

Address: 161 East High Street Forfar DD8 2EQ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This proposed development will remove 113 acres of prime development land with little

economic benefit.

This proposed development will generate odour, noise impacting on local residents.

The local roads are not suitable for heavy traffic. This will cause a hazard to both residents and visitors.

This proposed development is out of keeping with the existing buildings. It will be industrial in nature, completely out of tune with the country setting.

Sent: 15 October 2021 12:10

Subject: Planning Objection

Ref - 21/00602/FULM

I wish to object to the above application on the grounds noted below-

- The sheds will generate harmful air borne particulates, odour, noise and light pollution impacting on residents of the nearby area and throughout Forfar dependant on wind direction
- In fields which are known to flood the site will require complex drainage and foul water management which cannot be relied on to prevent foul water run off and pollution to the land and waterways
- Local roads are not designed for the increase in heavy traffic which will increase pollution and road repairs are few and far between on main roads which means the local country roads will never be repaired when required
- The development is out of character for the local scenic landscape which attracts visitors to the area

With regards A Cameron Gowanbank Forfar

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Sarah Dundas

Address: Ardbeg (untill 05 Oct 2021 then Monikie DD5 3QQ Charleston Village Forfar DD81UF

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I would like to object to what is absolutely not an appropriate development, either in terms of the environment; the Angus Council Development plan; an essential service or enhancement in the area; animal or bird welfare. The whole scenario is barbaric on every level.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Patricia Harrow

Address: 21 Glamis Road Kirriemuir DD8 5BN

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Such a development would result in increased harmful pollution, foul odours, noise and light pollution which would affect nearby residents. There would be an increase in heavy vehicular traffic affecting nearly properties.

There is already a similar smaller unit so the proposed development would result in further negative aspects.

A large industrial development will remove 113 acres of grade 1 agricultural land from cultivation. It will not benefit the local economy.

There would be challenges to the drainage system to prevent foul water run-off and severe pollution in an area subject to flooding.

In addition this proposal does not accord with Scottish Planning Policy or Angus Local Development Plan policies DS1, DS\$, PV6, PV12, PV15, PV18 or PV20.

There is no need for such a large development of intensive egg production.

21/00602/FULM

Comment Ref: 21/00602/FULM Comment type: Objection

Submission time: 09/10/2021 8:10 PM

Comments: I object to the proposed intensive egg production unit (IPU) at Easter Meathie Farm. I object on the basis this proposal is in a scenic corner of rural Angus and is highly visible, exposed position set against the backdrop of Fothringham Hill and the hill of Lour.

I also object on the basis that the sheds will generate harmful airborne particles, odour, noise and light pollution as the sheds will result in 96,000 birds within a small rural area. Bearing this in mind the nearest house is only 350 metres downwind from the proposed sheds.

Thank you for your time.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure

including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Jenny Couper

Address: 11 Dunnichen Road Kingsmuir FORFAR DD8 2RQ

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Increased heavy agricultural traffic on a small quite rural road.

Ruin the picturesque landscape that is enjoyed by locals and tourists alike for many years. Increase in noise and light pollution Not to mention the effect the waste will have on the

surrounding waterways

Email to: planning@angus.gov.uk

FAO Case Ruari Kelly

Objection to:

21/00602/FULM Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping Land West Of Easter Meathie Farm Bungalow Lour Forfar

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 28 outbreaks of Avian Flu in the UK.

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

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, the capacity of this application will be a staggering **64,000** 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. <a href="https://www.gov.uk/government/publications/list-of-zoonotic-diseases

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

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

ANTIBIOTIC RESISTANCE

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

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

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

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

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

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

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

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

ENVIRONMENTAL IMPACT

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

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

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

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

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

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

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

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

Addressing the manner in which food is produced is one of the key elements in tackling biodiversity loss and climate change. The National Development Framework acknowledges the climate emergency and the need to re-energise the economy in a sustainable way by "achieving decarbonisation and climate resilience". The section on Natural Resources acknowledges that "ecosystems underpin our well-being, health and economy, culture and identity. We depend on them to provide us with food, raw materials and clean water and to regulate our climate and air quality. The need to reverse biodiversity decline and assist nature recovery is of imperative importance in its own right. Environmental pressures are causing global biodiversity declines at rates not previously encountered in human history and the rate of species extinctions is accelerating".

LOCAL IMPACT and SITE-SPECIFIC INFORMATION

The Visions and Outcomes stated in the Angus Local Development Plan mention:

- Planning makes Scotland a low carbon place reducing our carbon emissions and adapting to climate change.
- Planning makes Scotland a natural, resilient place helping to protect and enhance our natural and cultural assets and facilitating their sustainable use.
- **Protected and Valued**: Natural Environment Built Environment Heat and Energy Networks Water Environment Resources.

I cannot see anything is this application that aligns with these policy statements.

There appear to be 3 properties within 400 metres of the proposed application and also a Guides 'campsite' which is used by youth groups from all over the country situated just 1.8km downwind of the sheds.

A chicken farm of this size will produce enormous amounts of faecal matter, much of which will be deposited on the outdoor ranging areas and from there into the local watercourses and river habitats and on into the River Tay. The recent article and documentary Rivercide by George Monbiot describes the effect of this type of pollution will inevitably have: Britain's rivers are suffocating to death | George Monbiot | The Guardian

It should also be noted that there is an existing application is also in progress by the same agent Cogeo in Cononsyth for 64000 Birds Ref 21/00337/FULM and also Craignathro Eggs already has a single 32,000 hen shed, just 2km north of this proposed site, plus many other existing sites not listed here.

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 <u>doubled</u> 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 hens each, totalling 64,000. 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.

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 crammed, 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. Need more proof – please read the research highlighted in this booklet.

https://78460747.flowpaper.com/FactoryFarmingisharminganimalspeopleandtheplanet/

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

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Ms Mairi Wallace

Address: 25 Osnaburg Street Forfar DD8 2AA

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:It's not right to build a factory in the middle of scenic farmland.

It will really spoil the environment and the view that so many enjoy.

It will disrupt and destroy the habitat of many native species, hares, larks, hedgehogs, shield bugs, sparrowhawk's, migratory geese and many more.

The creation of pollution, noise, odour, foul water, air pollution and light pollution will be horrendous. Especially since these fields get flooded.

I believe this development is also contrary to a number of Angus Local Development Plan policies.... DS1, DS4, PV2, PV4, PV6, PV12, PV14, PV20

Planning Department,
Angus Council,
Angus House,
Orchardbank Business Park,
Forfar
DD8 1AN

Dear Sirs,

Easter Meathie Hen Units - Reference 21/00602/FULM

I wish to object to the proposed erection of two 32,000 capacity free-range hen sheds and associated infrastructure as set out in the application noted above.

I very strongly object to the above enterprise and cannot see it as an asset to the area.

Signed:

Name: MRS VIOLET PATERSON

Address: BAIRLIE PLACE,
NORTH MUIR,
KIRRIE MUIR.

ANGUS

Date: 11/10/2021.

Eve	lyn	В.	Re	id
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44 Kemsley Park

Forfar

DD8 1HE

Planning Department, Angus Council

Angus House, Orchardbank Business Park

Forfar

DD8 IAN

Easter Meathie Hen Units/Reference 21/00602/FULM

Dear Sir/Madam

I am writing to object to the abovementioned proposed development. As a local resident I am strongly opposed to the proposed development on the following grounds:

- I feel it is out of character with the surrounding rural landscape and will have a detrimental
 effect on the scenic beauty of the area.
- I am concerned about the effects of the development on the living conditions of those living in the surrounding area, particularly regarding the odour that will be produced.

Yours sincerely

Evelyn B. Reid

18.10.PC CO? 37 Potters Park Cres., Forfor Augus DD8/1HH. 11/10/21

Dear Sir,

Jobject strongly, to the

Proposed Dutensive Egg Portuetion

Proposed Dutensive Egg Portuetion

Muit at Easler Meathie Farm.

Unit at Easler Meathie Farm.

Ourongst others, Jobject to the

Sheds generating particulates, odour, noise

or light pallution.

Mue roads are not designed for the

increase in heavy websele trappe and
there could be foul water remark which

will pollute the waterway.

So, in my opinion, its a resounding,

"No", to the Easter Meathie proposal. Marie you.
Yours truly,

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr William Black

Address: 39 Earlspark Drive Bieldside Bieldside, Aberdeen AB15 9AH

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This proposal takes some of the country's best farmland out of production, replacing it

with sheds producing greenhouse gases and other pollutants.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Susan Black

Address: 39 Earlspark Drive, Bieldside Aberdeenshire Aberdeen, Scotland AB15 9AH

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The sheds are too close to neighbouring houses which will be blighted by air-borne

pollution, smells, noise, increased heavy traffic, rats and flying insects

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Edward McCallin

Address: 3 Osprey Drive Gowanbank Forfar DD82UW

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The planning proposal under reference 21/00602/FULM contravenes the Angus Local

Development Plan policies DS1, DS4, PV2, PV4, PV6, PV12, PV14, and PV20.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mr Victor Edmonds

Address: 15 Turfbeg Road Forfar DD83LT

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: I live at the other side of Forfar, but I am still impacted by the smell from the existing sheds at Craignathro.

The construction of two further sheds at Easter Meathie will undoubtably increase the smell considerably and contaminate the atmosphere, which is a topical subject as Scotland is hosting the climate change conference next month.

Also the roads surrounding the area are not suited to heavy vehicle traffic, and I believe the ground is liable to flooding so if this proposal were to go ahead there could be contamination due to run off.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Mona Edmonds

Address: 15 Turfbeg Road Forfar DD83LT

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I am affected by the smell coming from the two existing sheds at Craignathro so the erection of two further units at Easter Meathie is only going to make the pollution worse. I am also concerned about the increase in heavy vehicle traffic on small country roads for which they were not designed.

In addition I think that an industrial development taking the place of prime agricultural land in a scenic rural area is detrimental to the local area.

Gavia Project Number: P21272

Contract: Easter Meathie Hen Shed Development Independent Hydrology Review

Client: Lour Farms Date: 25/10/2021 Author: Derwyn Lear



Introduction

Gavia Environmental Ltd were commissioned by Lour Farms to provide an independent review of the hydrological assessments undertaken in support of the proposed hen shed development at Easter Meathie Farm, Angus (Planning Application Reference 21/00602/FULM). The following reports have been reviewed:

- Environmental Impact Assessment Report Chapter 13 Hydrology (Fluid Environmental 2021).
- Flood Risk Assessment (Katherine Colby Hydrologists 2021).
- Drainage Impact Assessment (Katherine Colby Hydrologists 2021).
- Foul Water and Drainage Statement and Strategy (Milestone Environmental 2021).

Proposed Development

The proposed development entails 5680m² of new agricultural units including a shed with capacity for 64,000 hens and a packing facility, and an outdoor range of 46Ha. The proposed development is located at Easter Meathie Farm south of Forfar, Angus. The development is located at the foot of Fotheringham Hill within a shallow topographic basin. The area is referred to as the 'Moss Lands of Meathie' on Ordnance Survey mapping.

Site Description

The development drains to the Spittal Burn, which flows eastward from the site into the Kerbet Water, Dean Water, River Isla and subsequently the River Tay. All downstream watercourses are located with the River Tay Special Area of Conservation (SAC), designated for protected aquatic ecology and habitats.

The proposed hen sheds sit directly adjacent to a natural topographic basin with a low point of 97.38mAOD indicated on the submitted Topographic Site Plan (COGEO 2021). The topographic low point is not associated with standing water or a watercourse. It is possible that the hollow has formed from the historic removal of peat from the area, the drainage of the area that may previously have been marsh or a previous routing of a minor watercourse which has now been diverted north. Based on anecdotal evidence the area is currently manually drained by a network of culverts, a sump and a pumping station, the layout of which is indicated on Figure 1. This system is assumed to act to lower the surrounding water table within the area of the hollow and discharges the collected groundwater to the Spittal Burn.

There are two watercourses adjacent to the proposed development; the Spittal Burn is located 270m north from the proposed hen sheds, whilst an unnamed tributary of the Spittal Burn is located 170m east from the proposed hen sheds. Watercourse bed levels within the Spittal Burn adjacent to the development are indicated to range from 96.88mAOD to 96.32mAOD, whilst bed levels within the unnamed tributary are indicated to range from 97.7mAOD to 96.97mAOD (COGEO 2021). This results in the low point of the development being approximately 0.32m below the bed level of the nearest section of open watercourse (the unnamed tributary).

The proposed development, including the outdoor range, covers the functional floodplain of the Spittal Burn, as well as an extensive area of pluvial flooding. Whilst modelling of the extent of flooding has not been undertaken within the remit of this report, flood mapping data from UK FloodMap4 (Ambiental Risk Analytics 2021) has been purchased to support the technical review. Indicative flood extents for the 1 in 30 year and 1 in 250 year fluvial and pluvial events are shown on Figure 2 and Figure 3 respectively. These generally indicate that out-of-bank flows on both the

Gavia Project Number: P21272

Contract: Easter Meathie Hen Shed Development Independent Hydrology Review

Client: Lour Farms Date: 25/10/2021 Author: Derwyn Lear



Spittal Burn and the unnamed tributary have the potential to inundate an extensive area encompassing the proposed outdoor range, a bund and a swale. The limited difference between the 1 in 30 year and 1 in 250 year event extents indicate the frequency in which the site may be affected by this flood mechanism. These observations are in accordance with anecdotal reports of flooding in this area and SEPA online flood maps.

EIA Report Chapter 13

The requirements of the EIA report are set out within the Angus Council Scoping Opinion report 20/00658/EIASCO (Angus Council 2020). The following key points are noted from this report with regards to the requirements of each chapter:

- "The EIA Report is required to undertake an assessment of the proposed on the water environment. The assessment is required to consider flood risk, wastewater drainage, surface water drainage, existing groundwater abstractions and water abstraction.
- A description of the relevant aspects of the current state of the environment (baseline scenario).
- A description of the factors specified in Regulation 4(3) likely to be significantly affected by the development... water (for example hydromorphological changes, quantity and quality).
- The description of the likely significant effects on the factors specified in Regulation 4(3) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development.
- A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any
 identified significant adverse effects on the environment and, where appropriate, of any
 proposed monitoring".

The requirement to identify likely significant effects and thus accurately target mitigation measures fundamentally requires the development of a risk assessment framework which apportions a sensitivity or value to a receptor, and a magnitude of effect to a particular change, in line with EIA regulations (Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017) and various supporting guidance (NatureScot 2018, IEMA 2020).

With reference to the requirements of the EIAR chapter described above, the following observations are noted regarding the Hydrology EIAR chapter:

- A brief baseline section is provided, however critical elements have been missed such as the River Tay SAC boundary being located only 2.5km downstream, existing drainage systems and the inherent flood risk conditions associated with the site (groundwater and surface water). The hydrological receptors are not clearly identified, and an importance value is not assigned to any receptors.
- The downstream Kerbet Water (located within the SAC) is noted to be of a Moderate overall WFD status in the EIAR chapter with the 'main impact being related to water levels and flows'. Our review of the WFD data indicates that water quality from diffuse rural sources is also a key impact affecting the water body, which is something that the proposed development could potentially worsen without appropriate design and controls. The overall water body status in 2019 is also noted to be 'Moderate Ecological Potential' due to the heavily modified classification.
- The chapter does not feature an impact assessment or identification of potential effects as would be expected for an EIA, but instead provides a summary of the drainage impact

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assessment, flood risk assessment, and foul water drainage strategy and surface water management plan reports. It should be highlighted that these reports do not fulfil the requirements of an EIA and are tailored to addressing a specific technical design issue rather than assessing broader impacts on the overall water environment.

- Due to the structure of the report being based around summarising separate technical reports, there is no conclusion as to whether there are any significant effects on hydrological receptors.
- The structure also results in key topics not covered by the supporting technical assessments being ignored, such as hydromorphological impacts from the proposed watercourse channel adjustments for flood risk mitigation, and the impact on downstream water quality from runoff from the development area, given the outdoor range and proposed drainage are likely to be subjected to flooding.

In summary, the hydrology EIAR chapter would not seem to fully meet the requirements of an EIA or the Angus Council Scoping Opinion, neither does it identify potential significant effects that can then be used to demonstrate the mitigation required to reduce adverse impacts on the water environment to an acceptable level. Whilst it is acknowledged that flooding and drainage are the key considerations for the development, there are still other potential impacts which should either be properly assessed or scoped out with justification.

Flood Risk Assessment

As noted within the Site Description section, the proposed development is located directly adjacent to a large area of functional floodplain associated within the Spittal Burn and the unnamed tributary. The site also has an inherent risk of surface water and groundwater flooding due to the topographic hollow that is located below the bed level of the adjacent watercourse. The application is required to adhere to SEPA guidance for undertaking an FRA (SEPA 2019). Our review of the FRA against SEPA guidance and our knowledge of undertaking FRAs in similar settings has identified several issues in the assessment and methods adopted. These are outlined in Table 1 below.

Table 1: Issues with FRA Approach

Good Practice	Approach Adopted with FRA	Potential Implications
More than one design flow estimation should be adopted, with FEH statistical method not recommended for small catchments, and FEH rainfall runoff, IH124 and ReFH2 considered the most suitable for small Scottish catchments.	Only FEH Statistical was adopted in the assessment, with a peak flow of 4.428m³/s estimated for the 1 in 200 year event on the Spittal Burn (@ downstream site boundary).	The lack of comparison with other methods may result in an under-estimation of peak flows and hence the flood risk posed.
Where flood mechanisms are dominated by floodplain processes, 1D/2D modelling should	No modelling has been undertaken other than estimates of channel capacity using manning's equation at	The approach adopted is not considered appropriate for the complex setting where modified watercourses and substantial

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Good Practice	Approach Adopted with FRA	Potential Implications
be undertaken to accurately determine the routing of flood flows and accurately depict the extent of flooding caused by out-of-bank flows.	certain locations. This method is sometimes acceptable where there is a clearly defined and steep channel, however it is not considered appropriate for a location with flat terrain and substantial out-of-bank flows.	areas of lower terrain / functional floodplain exist. Estimates of channel capacity do not indicate where out-of-bank flows are transferred to and the depth to which they accumulate. It is likely that the low point discussed earlier will fill with fluvial floodwater, from which no drainage mechanism is possible other than infiltration.
FRAs should provide an accurate level (mAOD) of fluvial flooding at the development site, and then a proposed finished floor level taking into account the design flood level. In line with SEPA guidance the design flood event should be the 1 in 200 year plus 35% allowance for climate change for the proposed development.	The FRA methodology does not provide a fluvial flood level for the proposed development. The channel capacity sections only indicate several locations where out-of-bank flows may occur, but it does not quantify the risk posed. Climate change has not been accounted for in the flow estimations.	It is not clear if the development has been located outwith the functional floodplain, or whether it meets the required level of protection from the future impacts of climate change on fluvial flows, from the information presented.
Any new development must not result in a loss of floodplain storage. Mitigation that involves land raising is unlikely to be acceptable within undeveloped floodplain.	Although the risk (extent and depth) of fluvial flooding posed to the development is not quantified in the FRA, mitigation is proposed in the form of a bund on the downslope side of the development. It is unclear how the requirements, size or position of this feature has been determined without hydraulic modelling.	The proposed bund would appear likely to be located within the functional floodplain based on the publicly available indicative flood extent data purchased for this report. If hydraulic modelling confirms this, this may result in an increased risk of flooding downstream due to loss of floodplain storage and disruption to flood flow pathways.
Modifications to a watercourse channel are generally not considered acceptable as a means to allow new development within the functional floodplain.	The FRA proposes improving channel capacity at sections where out-of-bank flows have been indicated as a means of overcoming the flood risk posed to the development. The only detail given is that the slope would be made more uniform.	Improving channel capacity at one location may result in an increase in flood risk and erosion risk downstream. It is likely that the channel will adjust back to the existing condition and so it is unlikely to be a permanent solution without ongoing maintenance. The activities

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Good Practice	Approach Adopted with FRA	Potential Implications
		would likely require CAR authorisation from SEPA and it is unclear if this could be granted for the purposes of permitting a new development.
An FRA should consider all potential sources of flooding and detail any structures that have the potential to impact flooding to the development.	The FRA provides limited information with regards to the existing pumped drainage system which reportedly acts to lower groundwater levels within the vicinity of the development. The FRA does not identify this potential source of groundwater flooding, but recommends hard flooring and construction practices that are 'mindful' of the risk of groundwater.	Potential failure of the existing pumped system is likely to result in raised groundwater levels with potential inundation of large parts of the outdoor range and impacts on the foundations of the proposed hen sheds, if not properly accounted for. The drainage system has not been mapped but based on the location of manholes, may be directly located underneath the proposed hen sheds. Disruption of this system during construction may result in pollution and flooding, whilst failure to adopt during operation may make the site redundant for its purposes as an outdoor range depending on the extent and duration of groundwater flooding. Raised groundwater levels will also reduce floodplain capacity which may worsen fluvial flooding from the surrounding watercourses and pluvial flooding.

Drainage Impact Assessment

The Drainage Impact Assessment (DIA) report sets out the drainage design to be adopted for the proposed development. DIAs are typically required to estimate the increase in surface runoff associated with a proposed development, and quantify the drainage storage requirements to ensure post development runoff rates are restricted to pre-development conditions. The DIA report appears to repeat the surface water flooding section already presented in the FRA, before outlining surface water management measures. The following observations are noted with regards to the DIA:

 Pre-development and post development runoff rates do not appear to have been quantified, and so it is not possible to ascertain if the SuDS proposed are adequate for the volumes anticipated.

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- As with the FRA, the existing pumped drainage system which lowers the groundwater levels within the area is not mentioned or accounted for within the design. The failure of this system could affect the treatment and attenuation performance of the proposed SuDS.
- As with the FRA, climate change does not appear to have been accounted for within the sizing
 of the drainage system, and indeed no drainage modelling has been undertaken to assess the
 system against a range of different rainfall event durations.
- Rainfall runoff from the hen shed roof and egg packaging buildings is proposed to tie into a lined swale located within the outdoor range to the north of the proposed hen shed. This will then tie into a constructed farm wetland to the east of the development before then discharging into the unnamed tributary. It is unclear how this system would function given the swale would be located at a lower elevation to the proposed wetland and the watercourse bed level. It would seem difficult for the swale to achieve the minimum required gradient levels without land raising or significant earthworks, which would have secondary flood risk impacts. Due to the topography, the whole drainage system would also be at a high risk of failure during fluvial, pluvial or groundwater flooding events, also posing a secondary pollution risk.
- The DIA seems to state that the wetland should be sized to cover an area of 17,600m² to meet Constructed Farm Wetland guidance (Carty et al. 2008). The wetland shown on the accompanying Drainage and Foul Water Arrangement covers an area of approximately 2,400m². The proposed drainage design therefore does not seem to meet the requirements set out within the DIA report. As with the swale, it is also not clear how this wetland will function given the limited fall to the watercourse. A drainage model would be beneficial to accurately size these features and the associated pipe connections to ensure that the system will be self-cleaning and not pose a secondary flood risk or pollution risk.
- The access track is proposed to drain into a filter strip and filter drain. The DIA states that these SuDS will be located to the north of the access track as there is assumed to be no open watercourse at this location based on the topographic survey. This indicates that the designer has not visited the site or consulted with the landowner to confirm the presence of watercourses or indeed subterranean drainage which is likely to also be present at this location.
- The DIA also states that it is unconfirmed how the development would be constructed, either
 of cut and fill or ground level raising. This would seem fundamental to the drainage design
 given the limited fall to the adjacent watercourse and adjacent area of pluvial and fluvial
 flooding.

Foul Water Strategy

The Foul Water and Drainage Statement and Strategy (Milestone Environmental Ltd 2021) report sets out the proposals for managing poultry and human flows from the new proposed development. The following observations are made regarding these proposals:

- The accompanying Foul Water Drainage Statement states that the site is within a Drinking Water Protected Area (Groundwater) and therefore discharge to groundwater is not permitted. Almost all of Scotland is located within a groundwater DWPA and this does not preclude discharge to groundwater, which remains the preferred mechanism for disposal from small private sewerage systems.
- The foul water strategy will involve human flows being treated via a package sewage treatment plant prior to discharge to a 'neighbouring' watercourse. It is assumed the

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watercourse would be the unnamed tributary which is likely to provide limited dilution and removal of waste products. An assessment of low flows and determination of the dilution ratio should be undertaken to determine the suitability of this proposal and the effluent requirements of the treatment plant.

- The foul water strategy states that the treatment plant and associated drainage will not be located within the 1 in 200 year flood extent from the Spittal Burn, however as noted earlier this extent of flooding has not been determined within the FRA.
- Poultry litter is proposed to be dried within the hen sheds prior to off-site storage and use on surrounding farmland as fertiliser. Specific detail on these facilities is not provided though it is acknowledged these would be subject to a PPC permit application. This activity has not, however, been mentioned within the EIAR chapter, despite the existing pressures from diffuse pollution.

Summary

In summary, our review of the supporting hydrological assessments for the proposed hen shed development has identified the following key issues:

- The EIAR Hydrology Chapter generally does not follow EIA guidance and the scoping opinion of the local authority, primarily by failing to value key sensitivities and identify potential significant effects through the use of a risk assessment framework.
- The FRA does not adhere to industry standard and SEPA guidance methods for assessing fluvial flooding from locations dominated by floodplain mechanisms (i.e. 1D/2D hydraulic modelling). Climate change has also not been accounted in the assessment. Therefore, the FRA does not demonstrate the level of flood risk posed to the development.
- The proposed mitigation recommended within the FRA also does not follow good practice and based on our review may increase flood risk downstream and cause unnecessary in-channel disturbance to adjacent watercourses.
- The proposed drainage design does not seem to have been modelled using drainage design software and may not function given the topographic and flood risk constraints. The sizing and placement of SuDS seems not to fulfil the requirements set out within the DIA report.
- There seems to be a lack of local knowledge considered within the FRA and DIA, with a well reported pumped drainage system that likely lowers groundwater levels in the area of the proposed outdoor range not having been considered within the assessments. Failure or lack of adoption of this system may significantly increase the risk of flooding to the development from fluvial, pluvial and groundwater sources. Further intrusive investigations should be undertaken to characterise this system and account for it in the design of the development.

References

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IEMA (2020). Impact Assessment Guidance.

Katherine Colby Hydrologists (2021). Flood Risk Assessment. Land at Easter Meathie, Forfar.

Katherine Colby Hydrologists (2021). Drainage Impact Assessment. Land at Easter Meathie, Forfar.

Milestone Environmental (2021). Foul Water Drainage Technical Statement.

NatureScot (2018). A handbook on environmental impact assessment: Guidance for competent authorities, consultees and others involved in the Environmental Impact Assessment process in Scotland.

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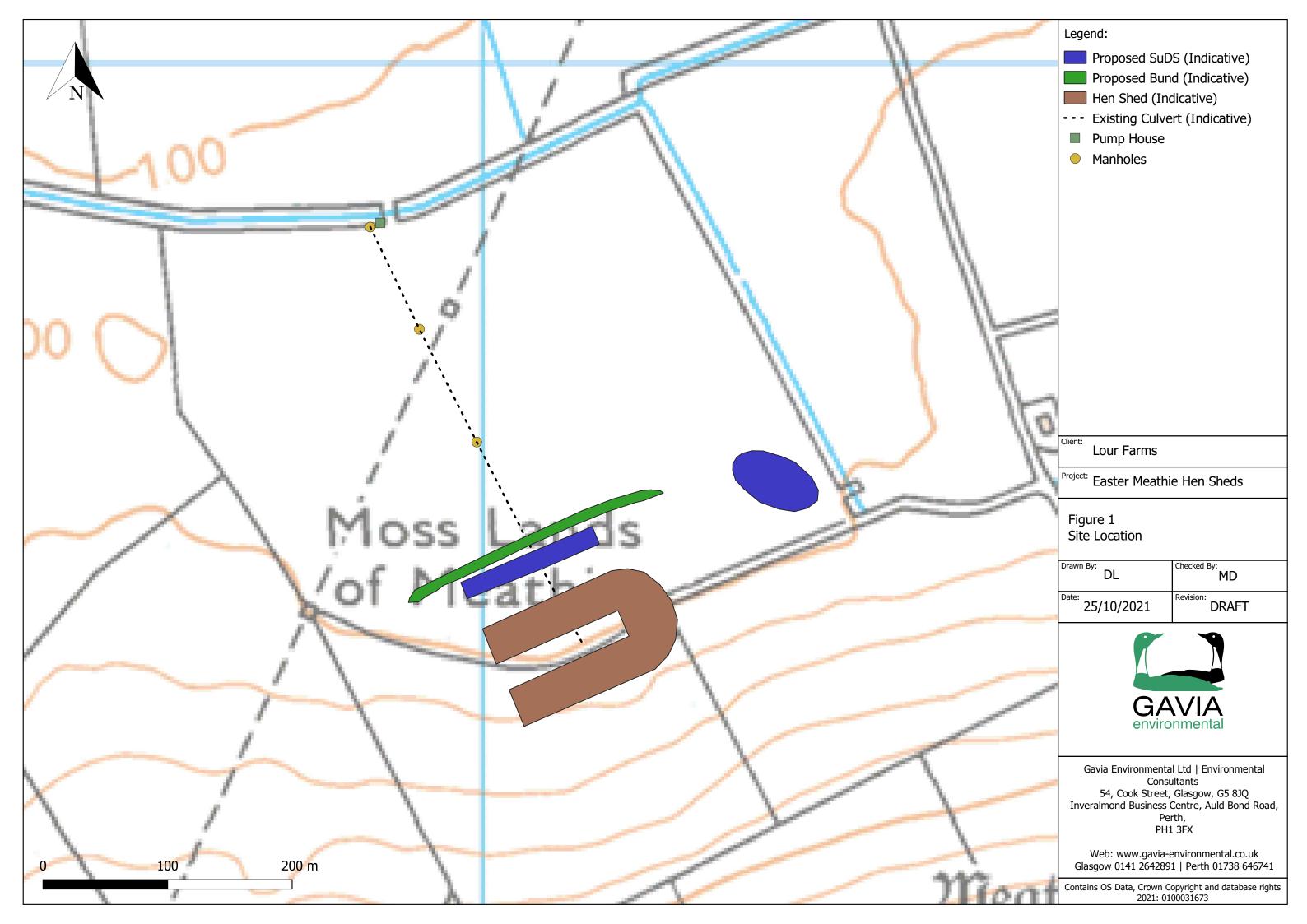
Gavia Project Number: P21272

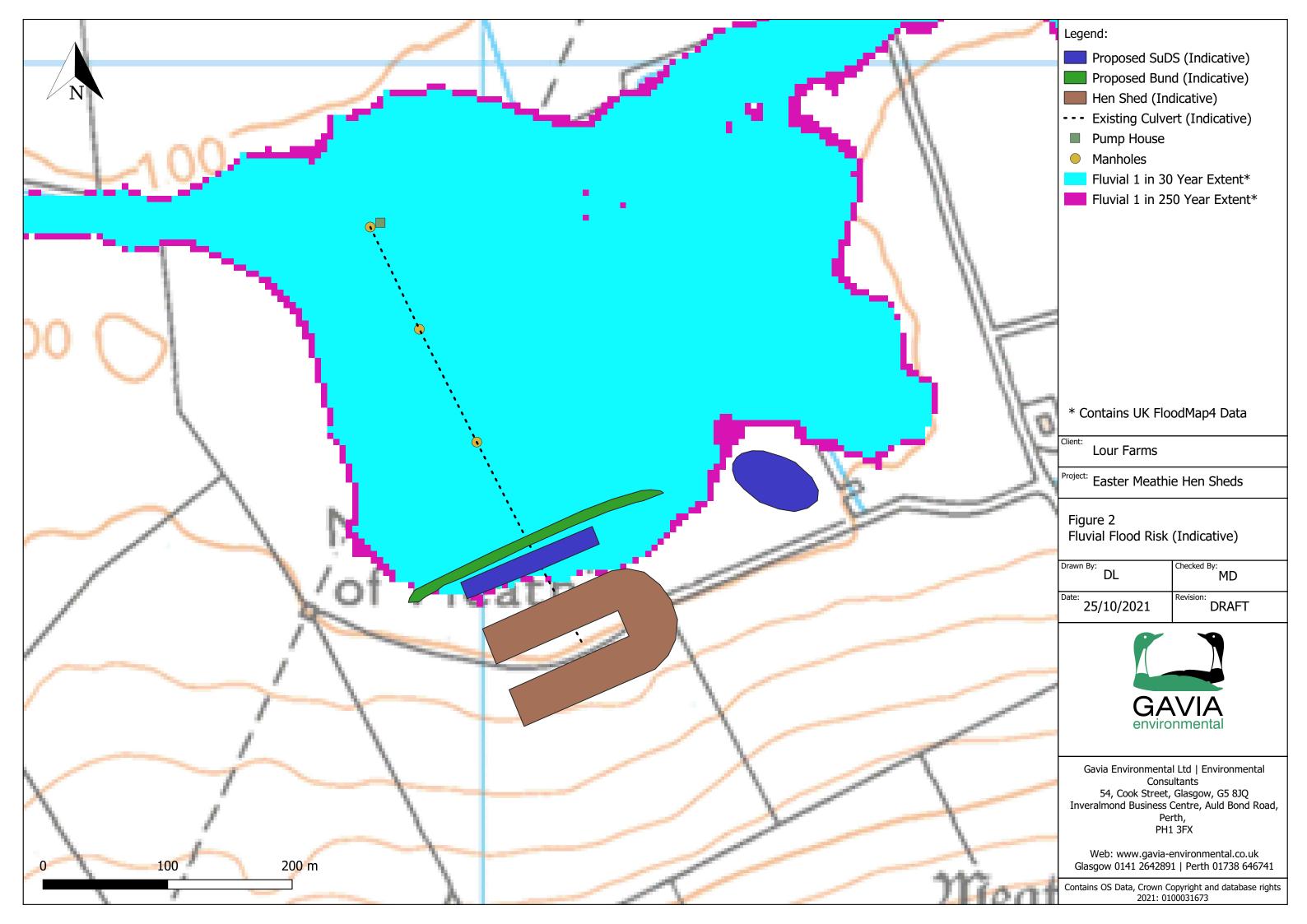
Contract: Easter Meathie Hen Shed Development Independent Hydrology Review

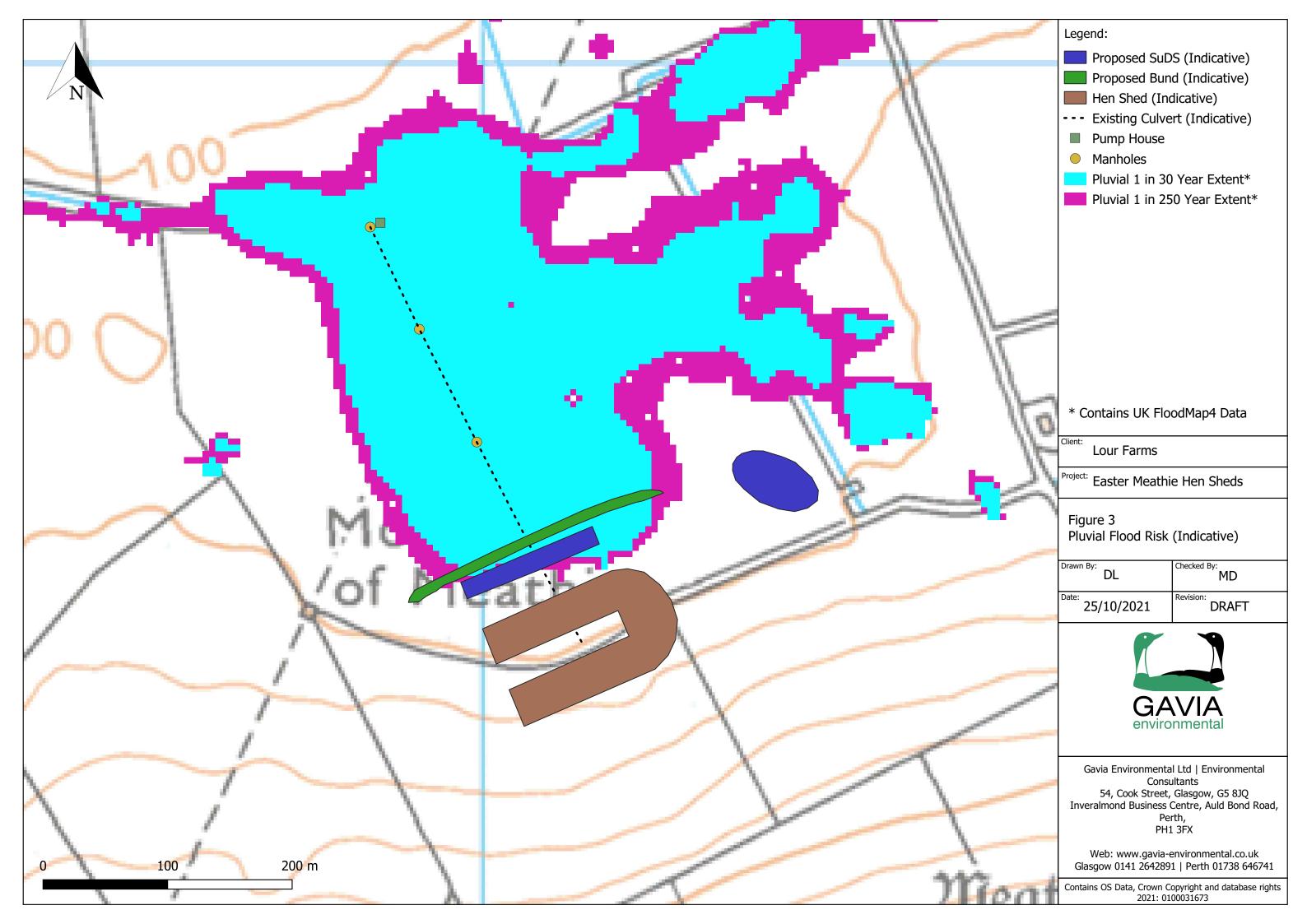
Client: Lour Farms Date: 25/10/2021 Author: Derwyn Lear



Appendix A: Figures







Comments for Planning Application 21/00602/FULM Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated

infrastructure

including feed silos, egg packaging facility, vehicular access, access tracks, drainage

and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Munro

Address: 48 Callander Drive, Forfar DD8 3DD

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment:

There should be no doubt in the mind of councillors that this industrial development is entirely inappropriate for its rural location.

I oppose to the above development and the detrimental effect it will have in and around the surrounding area. I hope you consider the feelings of the local residents and know that we all strongly object to this application.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Bridget Crossman

Address: 30 Canmore Street Forfar DD8 3HT

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This would increase the likelihood of Bird Flu in Angus, which is already an issue and a very important and immediate problem. See: https://www.lidl.co.uk/c/bonfire-night/c2105
Also, the site is vulnerable to flooding, which again, is an important and immediate issue, which has been on the increase year upon year and a major issue that COP26 is addressing and has to make appropriate decisions about the increasing danger this is causing.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure

including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Ms Kirsty Anderson

Address: 4 Wyllie Street Forfar DD8 3DN

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: The proposal is in a scenic corner of rural angus and is in a highly visible, exposed position set against the backdrop of Fothringham Hill and Hill of Lour. The development is industrial in nature and will be out of character with the rural landscape and the existing traditional clusters of farm buildings. It will become the central, dominating feature in the currently scenic, southerly views from the Forfar Path Network. The need to level the site, along with stripping back of the grass by foraging hens around the buildings, will only add to the adverse visual impact. The development area will remove 113 acres of prime agricultural land from cultivation and will be of little economic benefit to our community. The tripling of such units will results in 96,000 birds within a small rural area and is a development of inappropriate scale, at odds with the local character. The sheds will generate harmful air borne particulates, odour, noise and light pollution impacting on the local residents of Easter and Wester Meathie, Lochlands Park, on Mosside Road and at Ladenford. The nearest house is only 350 meters downwind from the proposed sheds. In fields which are known to flood the site will require complex drainage and foul water management which cannot be relied on to prevent foul water run-off and pollution to both land and waterways. The local roads are not designed for the increase in heavy vehicle traffic which will cause pollution and be hazardous to both residents and visitors. This proposal is contrary to the Angus Local Development Plan policies DS1, DS4, PV2, PV4, PV6, PV12, PV14, PV20.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Ms Wendy Gammie

Address: 13 Upper Constitution Street Dundee Dd3 6jp

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:For these sheds to be built, it completely ruins the rural aspect of this bit of the countryside. Such prime farmland should and could be used for much more environmentally friendly uses. Crop farming in some of the best farm land in the country is a much more productive use of this land. Crop farming allows for carbon capture, whereas hen houses produce massive amounts of ammonia and damage the environment further.

Further, the Angus glens are recognised areas of natural beauty, allowing these enormous hen houses to be built at the foot of them will ruin this completely.

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and

landscaping

Case Officer: Ruari Kelly

Customer Details

Name: Mrs Rhoda Miller

Address: Basement Flat 13 Windsor Street Dundee DD2 1BP

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment: This proposed application is contrary to the Local Development Plan. The sheds will produce ammonia and other toxic gasses affecting the environment and particularly those living nearby. Prime farmland will be destroyed and given the risk of flooding the risk of polluted waterways is significantly increased. The rural nature will also be destroyed and people's enjoyment of the environment degraded. The roads are unsuitable for the increase in traffic generated by this industrial process.

White Cottage, Easter Meathie Farm, Forfar Angus DD8 2LF

8 November 2021

The Planning Department, Angus Council, Angus House, Orchardbank Business Park, Forfar DD8 1AN

Dear Sirs,

Re: Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping. Reference: 21/00602/FULM.

Further to my letter of objection dated 22 Sept, 2021 and my comments regarding viruses resulting from intensive units of this type I wish to draw the Department's attention to the the recent imposition of bird flu prevention zones across the county following the discovery of the H5N1 virus at Wester Braikie Farms, near Arbroath, where a 3km Protection Zone and a 10km Surveillance Zone have now been put in place.

The last prevention zone stemming from avian flu in November 2020 was only lifted on 15 May 2021 whilst the final cleansing and disinfection on the last affected infected premises was only completed on 5 August 2021. This was after the 'lockdown' of poultry from 14 December 2020 to 1 April 2021 when birds were confined within their sheds. It should be noted that after 16 weeks confinement the birds lose their 'free range' status.

It seems that the incidence of avian flu, in all its different strains, will become a regular feature for poultry farms. The UK Chief Veterinary Officer has noted that 'there is a constant risk of the disease returning through wild birds and this is likely to increase as winter approaches'.

Like Wester Braikie Farms, Easter Meathie farm lies on the migration route of many of the wild birds found in the Montrose Basin and I have seen over the years many flocks of what were evidently migrating birds resting in the surrounding fields at this time of year, following the harvesting of crops. It does not take a great leap of imagination to see migratory wild birds mixing with hens on the proposed ranges around Easter Meathie and the very real possibility of cross infection and subsequent infection of the local wild birds which inhabit the neighbouring gardens. Furthermore, rodents are also a vector for such

viruses and I am particularly concerned about the increase in vermin that will result from the proposed sheds being placed so close to residential properties. Similarly, given the possibility of the flooding of the infected ground, the risk of spreading is greatly increased.

I am aware that the advice is that there is little risk to humans but deaths due to the many strains of avian flu have been reported from around the world and are increasing. In July 2021 an 11-year-old boy died in India from the H5N1 strain and I was perturbed to find that millions of birds are destroyed every year around the world due to avian flu. This is not just a Far East problem as there are regular, large outbreaks throughout Europe. Infections now seem to be occurring on a cyclical basis and we can be certain that they will reoccur in the UK, probably on an annual basis.

Intensive poultry units are breeding grounds for all types of viruses due to the confined, stressed conditions the birds are kept under, therefore it makes no sense to position the units close to human habitation and certainly not close to other such poultry units. A 3km Protection Zone was set up around Wester Braikie Farms and I would like to point out that the 32,000 bird unit at Craignathro is 2km to the north of the proposed site and would also impact on the nearby residents.

The applicant has provided no justification as to why these sheds <u>must</u> be located where they have proposed them, on prime farmland, merely that it suits them to place the sheds there. Such sheds can go anywhere there is suitable, preferably low grade, land and, given all the statements in the Local Development Plan concerning protecting the environment and potential health impacts, such developments should be placed well away from human habitation on low quality land, better suited to this type of operation.

Easter Meathie is not a suitable location for intensive poultry units

As I have stated previously, as one of the closest properties to this proposed intensive poultry unit any future outbreaks could impact significantly on myself and my neighbour and I ask that you take account of the issues noted above and my continued objection to the application.

Yours faithfully,

Douglas Watt

Submitted by email 8 November, 2021

Gavia Project Number: P22061

Contract: Easter Meathie Hen Shed Resubmission - Independent Hydrology Review

Client: Lour Farms Date: 15/02/2022 Author: Derwyn Lear



Introduction

Gavia Environmental Ltd were commissioned by Lour Farms to provide an independent review of the hydrological assessments undertaken in support of the proposed hen shed development at Easter Meathie Farm, Angus (Planning Application Reference 21/00602/FULM). The following reports were initially reviewed during October 2021:

- Environmental Impact Assessment Report Chapter 13 Hydrology (Fluid Environmental 2021).
- Flood Risk Assessment (Katherine Colby Hydrologists 2021).
- Drainage Impact Assessment (Katherine Colby Hydrologists 2021).
- Foul Water and Drainage Statement and Strategy (Milestone Environmental 2021).

Revised reports were submitted to planning in response to objections from SEPA. The following documents have now been reviewed:

- 21 00602 FULM-HYDROLOGIST RESPONSE SEPA FLOOD RISK CONSULTATION-3251965.
- 21 00602 FULM-FOUL WATER DRAINAGE STRATEGY-3251970.
- 21_00602_FULM-FLOOD_RISK_ASSESSMENT_APPENDICES_-_UPDATED-3252040.
- 21_00602_FULM-FLOOD_RISK_ASSESSMENT_-_UPDATED-3251966.

Background information and the outcome of previous review is detailed within our original technical note 21_00602_FULM-GAVIA_ENVIRONMENTAL_ON_BEHALF_OF_LOUR_FARMS-32325 07 as available on the planning portal.

Flood Risk Assessment

The principal concerns raised previously regarding the FRA were:

- The FRA does not adhere to industry standard and SEPA guidance methods for assessing fluvial flooding from locations dominated by floodplain mechanisms (i.e. 1D/2D hydraulic modelling). Climate change has also not been accounted for in the assessment. Therefore, the FRA does not demonstrate the level of flood risk posed to the development.
- The proposed mitigation recommended within the FRA also does not follow good practice and based on our review may increase flood risk downstream and cause unnecessary in-channel disturbance to adjacent watercourses.

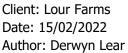
Table 1 below details the revised information provided and confirms whether this addresses the previous concerns raised.

Table 1: Review of revised FRA

Good Practice	Approach adopted within initial FRA	Approach adopted within revised FRA	Concern addressed?
More than one design flow estimation should be adopted, with FEH statistical method not recommended for small catchments, and FEH rainfall runoff, IH124 and ReFH2 considered the most suitable for small Scottish catchments.	Only FEH Statistical was adopted in the assessment, with a peak flow of 4.428m³/s estimated for the 1 in 200 year event on the Spittal Burn (@ downstream site	Flow estimates using ReFH2 have now been included within the FRA, however two methods appropriate for small catchments should be used for comparison.	No

Gavia Project Number: P22061

Contract: Easter Meathie Hen Shed Resubmission - Independent Hydrology Review





Good Practice	Approach adopted within initial FRA	Approach adopted within revised FRA	Concern addressed?
	boundary).		
Where flood mechanisms are dominated by floodplain processes, 1D/2D modelling should be undertaken to accurately determine the routing of flood flows and accurately depict the extent of flooding caused by out-of-bank flows.	No modelling has been undertaken other than estimates of channel capacity using manning's equation at certain locations. This method is sometimes acceptable where there is a clearly defined and steep channel, however it is not considered appropriate for a location with flat terrain and substantial out-of-bank flows.	There remains only 'OD' manning's equation assessments done which is not appropriate for a floodplain setting with out-of-bank flows. This has been justified due to the uniform anthropogenic channel however this makes no difference to out of bank flows.	No
FRAs should provide an accurate level (mAOD) of fluvial flooding at the development site, and then a proposed finished floor level taking into account the design flood level. In line with SEPA guidance the design flood event should be the 1 in 200 year plus 35% allowance for climate change for the proposed development.	The FRA methodology does not provide a fluvial flood level for the proposed development. The channel capacity sections only indicate several locations where out-of-bank flows may occur, but it does not quantify the risk posed. Climate change has not been accounted for in the flow estimations.	Climate change still does not seem to have been considered within the assessment. A max 1:200 year return period level of 99.29mAOD has been provided based on the flawed modelling approach, and a finished floor level (FFL) of 100mAOD has been proposed. However, the development is shown to be located within 98mAOD contour, with presumably an underbuilding or landraising to achieve the FFL, and the response to SEPA states "approximately half the proposed development would be within the 1 in 200 year design event extent". This would be contrary to Scottish Planning Policy (SPP); to locate developments	No

Gavia Project Number: P22061

Contract: Easter Meathie Hen Shed Resubmission - Independent Hydrology Review

Client: Lour Farms Date: 15/02/2022 Author: Derwyn Lear



Good Practice	Approach adopted within initial FRA	Approach adopted within revised FRA	Concern addressed?
		within the functional floodplain.	
Any new development must not result in a loss of floodplain storage. Mitigation that involves land raising is unlikely to be acceptable within undeveloped floodplain.	Although the risk (extent and depth) of fluvial flooding posed to the development is not quantified in the FRA, mitigation is proposed in the form of a bund on the downslope side of the development. It is unclear how the requirements, size or position of this feature has been determined without hydraulic modelling.	The FRA continues to mention a requirement for a bund to the north of the development, which based on the estimated 1:200 year flood level would be located within the floodplain. It is now proposed to provide a two-stage channel as mitigation to fluvial flooding. It is unclear where the displaced material would be reused and this may result in bunding within the functional floodplain. In addition, the estimated 1:200 year level and proposed FFL indicate that some form of land raising will be undertaken within the functional floodplain.	No
Modifications to a watercourse channel are generally not considered acceptable as a means to allow new development within the functional floodplain.	The FRA proposes improving channel capacity at sections where out-of-bank flows have been indicated as a means of overcoming the flood risk posed to the development. The only detail given is that the slope would be made more uniform.	The mitigation has been changed to incorporate a two-stage channel on the Spittal Burn to reduce the risk of flooding posed to the site. The impact on flood flows has not been quantified, therefore it is not known what benefits or downstream impacts this may cause. In line with the comments above, this may result in additional bunding within the floodplain,	No

Gavia Project Number: P22061

Contract: Easter Meathie Hen Shed Resubmission - Independent Hydrology Review

Client: Lour Farms Date: 15/02/2022 Author: Derwyn Lear



Good Practice	Approach adopted within initial FRA	Approach adopted within revised FRA	Concern addressed?
		increasing flood risk downstream which would be contrary to SPP.	
An FRA should consider all potential sources of flooding and detail any structures that have the potential to impact flooding to the development.	The FRA provides limited information with regards to the existing pumped drainage system which reportedly acts to lower groundwater levels within the vicinity of the development. The FRA does not identify this potential source of groundwater flooding, but recommends hard flooring and construction practices that are 'mindful' of the risk of groundwater.	The FRA notes the presence of manholes but does not relate this to a pumped drainage system or to a risk from groundwater and therefore there remains a lack of understanding of the system. It is proposed to disconnect any culvert underlying the development and divert to a ditch to the east. However, this will not resolve any issues with groundwater flooding in the area and the dependency on a pumped system to manage this.	No

Foul Water Drainage Strategy

The initial comments regarding the foul water strategy and comments on the revised information provided are outlined in Table 2 below.

Table 2: Comments on Revised Foul Water Strategy

Initial Comments	Comments Further to Resubmission
The accompanying Foul Water Drainage Statement states that the site is within a Drinking Water Protected Area (Groundwater) and therefore discharge to groundwater is not permitted. Almost all of Scotland is located within a groundwater DWPA and this does not preclude discharge to groundwater, which remains the preferred mechanism for disposal from small private sewerage systems.	The report still states this however it is a minor point.
The foul water strategy will involve human flows being treated via a package sewage treatment plant prior to discharge to a	An assessment has been undertaken which indicates a

Gavia Project Number: P22061

Contract: Easter Meathie Hen Shed Resubmission - Independent Hydrology Review

Client: Lour Farms Date: 15/02/2022 Author: Derwyn Lear



Initial Comments	Comments Further to Resubmission
'neighbouring' watercourse. It is assumed the watercourse would be the unnamed tributary which is likely to provide limited dilution and removal of waste products. An assessment of low flows and determination of the dilution ratio should be undertaken to determine the suitability of this proposal and the effluent requirements of the treatment plant.	dilution ratio of 1:15. The report states that a "mean ammonia concentration of no more than 5mg/l and a BOD concentration of no more than 20 mg/l is required." and proposes a reedbed system to achieve this. The PE calculations, low flows and proposed system should be agreed with the SEPA regulatory team to ensure that it can be authorised.
The foul water strategy states that the treatment plant and associated drainage will not be located within the 1 in 200 year flood extent from the Spittal Burn, however as noted earlier this extent of flooding has not been determined within the FRA.	A 1:200 year flood extent has been added to the drawings, however it is unclear where this has come from as it is not referenced within the FRA.
Poultry litter is proposed to be dried within the hen sheds prior to off-site storage and use on surrounding farmland as fertiliser. Specific detail on these facilities is not provided though it is acknowledged these would be subject to a PPC permit application. This activity has not, however, been mentioned within the EIAR chapter, despite the existing pressures from diffuse pollution.	No revised EIAR chapter has been submitted.

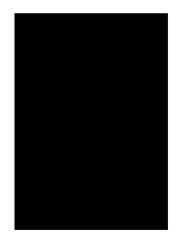
Summary

The following key observations are noted with regards to the revised documents submitted to planning:

- The revised Flood Risk Assessment does not fully address the concerns previously raised, and indeed provides new information on flood levels which demonstrates that the development is contrary to the principles of Scottish Planning Policy. Scottish Planning Policy is not referenced within the report and the conclusions and mitigation proposals outlined do not adhere to the policy.
- No revised Drainage Strategy has been submitted in response to the previous concerns raised, with the FRA still failing to consider local knowledge on a well reported pumped drainage system that likely lowers groundwater levels in the area of the proposed outdoor range.
- The revised Foul Water Strategy largely addresses the previous items however there is an unreferenced flood extent map which has informed the suitability of foul water infrastructure.
- No revised EIAR chapter has been submitted and there remains likely hydrological impacts in terms of flood risk and pollution that have not been fully realised or assessed.

Overall, the information and level of detail within the supporting assessments does not seem adequate given the high hydrological sensitivity of the site.





Date:- Tuesday, 7th March 2023

The Planning Department Angus Council Angus House Orchardbank Business Park Forfar DD8 1AN

To whom it may concern

Re: Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping.

Reference: 21/00602/FULM.

We are responding to the recent submission (21st December 2022) by the Applicant of Additional Information comprising a Manure Management Statement and other associated documents. We also include comments on the most recent drawings relating to Flood Risk Volumes and Compensation (15th February 2023) and the Applicant's interpretation of NPF4 (20th February). We have already commented on many of the diverse aspects of this application with supporting expert opinion and all our previously expressed concerns and objections still stand.

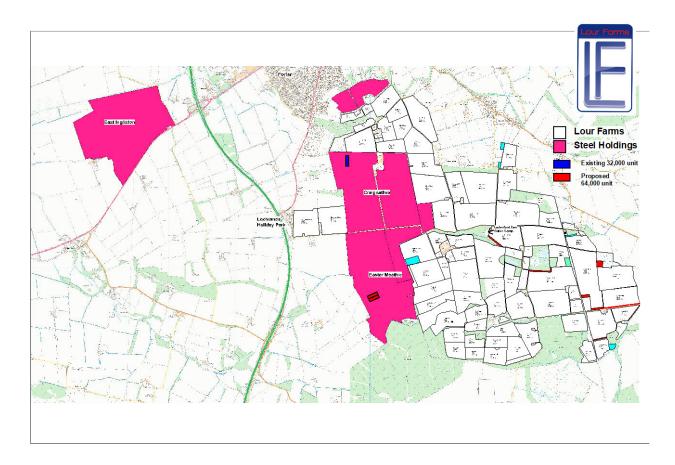
It is surprising to us that it has taken so long for the applicant to provide more information on the storage and spreading of the hen litter manure which will result from the proposed development. We note that queries relating to this aspect of the development were raised by your environmental officer and our own consultant, Airshed, as far back as October 2021 and September 2021 respectively.

Manure Spreading and Management.

We have reviewed the documents submitted by the applicant relating to manure management. The emissions from manure spreading are recognised to be an acute emission. From the outset the statement confirms that there is a lack of scientific certainty on this subject and that modelling cannot provide reliable predictions of the likely odour impacts. The approach taken is therefore to apply the regulations and best practice available, generally applied to slurry and solid manures, detailed in Section 7, and to apply them to the storage and spreading of poultry manure. What is not taken

account of is the particularly pungent and sharp odour from poultry manure which is very different and far more offensive than any odour from slurry or farmyard manures.

Consideration also needs to be given to the overall cumulative effect of having two poultry units within such proximity totalling 96,000 hens and thereby producing from the applicant's own figures, 2,340 tonnes of undried litter a year. It is understood from the Statement and my own calculations that at least half of this manure output and possibly much more will have to be applied on third-party holdings. The below map is provided to show Lour Farms landholding in white, the Applicant's landholding in pink and their proximity to the south side of Forfar. As adjacent neighbours on three sides we have natural concerns that a large part of the surplus manure may be spread locally, concentrating the odour effects within this rural area, and affecting the town of Forfar.



It is one thing for the local authority to be responsible for enforcing conditions on an applicant, but it is a little bit of a stretch to believe it feasible to use planning conditions effectively to control numerous third-party users who may not follow the proposed Management Plan or utilise the manure in such a way as to cause odour nuisance.

The procedures at the proposed Easter Meathie units state that the manure would be dried in the units before being temporarily stored before removal to off-site storage. SEPA has already queried the applicant's claim of belt 'drying' facilities within the units in their response of 18th January 2023, and we do also. This brings into question the associated claim that odour levels from the 'dried' manure will be reduced prior to temporarily storage and transfer. Very belatedly COGEO's latest document on NPF4 under Policy 12 – Zero Waste mentions for the first time that 'it has been concluded that heat exchangers installed within the hen sheds will create a drier indoor climate, resulting in a drier by-product'. This addition is not primarily a drying process and no detail is provided. The locations of temporary or off-site storage facilities are also not provided and while this may not concern SEPA or the PPC application such details should be of concern to the local authority and should be provided by the applicant.

As stated in our original letter Lour Farms recognise the value of poultry litter as a useful fertiliser and that the spreading of poultry manure is becoming a more widespread agricultural practice in Angus and cannot currently be controlled under the planning system. However cumulative development of the units which produce it in a small area is a material planning consideration. We have concerns that with two such units within such proximity totalling 96,000 birds, the odour problem could become very pervasive, and in still conditions within such a contained landscape an already existing problem will become concentrated and escalated. Any perceived manure production benefit as part of this proposal should be balanced against the consequent increase in odour effects and also recognising that the farmer already has an adequate supply of poultry manure for his own land from the existing IPU unit.

In terms of the Manure Management Plan and restrictions, there is another contradiction resulting from multiple units on this holding. The original unit of 32,000 laying birds did not require such strict regulation or a PPC permit and as we understand it from the applicant's statement manure is currently stored at Craignathro Farm possibly within the 'cordon sanitaire' prescribed for this current application. How will future monitoring and control differentiate between the two sources of manure?

The statement outlines the current storage and spreading of litter manure at Easter Meathie from the landowner's existing IPU at Craignathro stating boldly that as no complaints have ensued, they are therefore confident that "complaints would not be expected". While we accept that no official complaints have been made to Angus Council, the applicant's assurances do not accurately reflect the present odour effects. We have checked through the comments submitted by members of the public, particularly local and Forfar residents, and find that 18 make direct reference to unpleasant odours from current practice at Craignathro and a large percentage of local objectors mention concerns about odour generally. Even just over a period of a few weeks at the height of the summer, effects on the local amenity can be severe and long lasting in the memories of visitors affected. I would refer you to the letter of Will Bowen submitted on 22nd September 2021 and for the existing odour experience of residents, I would refer you to the letters of Donald Grant, Claire Crighton and Victor Edmonds submitted on the 5th, 6th and 25th October respectively.

Our concerns are not based on speculative hearsay, but direct experience of the adverse consequences from the applicant's existing unit. Manure spreading generally takes place at certain times of year within the agricultural cycle concentrated in two periods: late winter after the end of the closed period in February for spring cultivation or in August following harvest for winter sowing. Locally winter cereal cropping accounts for 75% of most arable production so the spreading period on the applicant's land falls in August at the height of the summer holiday period, when visitors come and local Forfar folk are out in the surrounding area enjoying the local amenity. As a local Forfar resident myself, I am witness to the pungent smell of chicken manure in the air on nice August days from the existing Craignathro unit. The greatly increased source of chicken manure will provide the opportunity for more extensive spreading on the applicant's land nearer Forfar and possibly on their East Ingliston holding, which is directly upwind of the town. Other local third-party users will simply add to and extend the area affected and the period of odour nuisance.

Outside the spreading activity period when odour more widely affects local residents and amenity users, there is also more concentrated and localised odour from temporary field storage heaps. These give off a very pungent and unpleasant odour particularly when stored in fields near local roads as has been our experience. Field storage is permitted for 26 weeks and may be a practice adopted by other neighbouring third-party users which will increase these unwelcome longer-term odour effects.

It is difficult to have great confidence in either the professionalism or objectivity of the applicant's consultants in preparing the Environmental Impact Assessment for this application which has been fraught with inadequate and misleading information requiring revisions, corrections and additional information to address many deficiencies over a very protracted planning process. The original assessment with respect to Air Quality, Dust and Odour was totally unsatisfactory as pointed out by our own consultant, Airshed, and now amidst recognised uncertainty, residents and planners are asked to accept an assessment of the impact of the storage and spreading of poultry manure based only on the applicant's professional judgement. Our experience certainly diverges from theirs and we hope that the Council will take a very cautionary approach on this subject. Once you have a high concentration of units with associated manure spreading close to and around Forfar, air quality will suffer, and it will become almost impossible to control.

SEPA PPC Certification.

On 29th January 2022 we contacted the then Case Officer to express concern and to seek clarification about the concurrent processing of the PPC and Planning Applications and that the possible outcome of a PPC application might influence any planning decision diminishing proper consideration of the local effects involved. On 1st February we received the following reply:

In relation to the other matter in your email the initial consultation response provided by SEPA confirms that the proposal falls under the Pollution Prevention and Control (PPC) Regulations 2012 section 6.9. - Intensive farming - PART A which requires that installations rearing poultry intensively with more than 40,000 places for poultry requires a PPC permit from SEPA before it can operate. The planning application and PPC Permit are two separate and independent consenting processes. The planning application can be determined independent of the PPC Permit process and the PPC permit process is not a material consideration that would influence the outcome of the planning application.

Following sight of the recent Cononsyth Report of Handling (21/00337/FULM) and viewing the virtual Committee Hearing of that application, it would appear to us that the previously granted PPC permit was presented as a material consideration when deciding that application.

Reprise of Our Objections

It is now nearly eighteen months since we submitted our original objection (23rd September 2021) and in view of the volume of further documentation submitted by the applicant it seems appropriate to briefly review and update our grounds for objecting to the Easter Meathie application.

Landscape and Visual

The location of this proposed development is a very exposed site in a small and scenic corner of Angus where the landform gives the agricultural land a sense of enclosure and provides open views from the surrounding land. The proposed development will lie centrally in this landscape which is devoid of the benefit of any screening, few walls or fences, field or road hedging or significant stands of trees, and it will have considerable impact from all quarters and particularly from Balmashanner Hill to the north from where it will be in central focus. As a result of the challenging hydrology of the site, the building will require considerable cut and fill to level and elevate the foundation and access on a platform above the natural landform and it will be far from discrete. The most recent flood risk compensation information submitted on 15th February indicates that further extensive groundwork will be required to the north and west of the site

through cut, fill and reformation of the landscape. These changes will be permanent and will add significantly to the prominence of the development and its visual impact. The photomontage visualisations are not representative either of the area or how this development will appear in the landscape, particularly in view of the recently submitted changes in levels and groundwork required. For a more accurate impression of the area, we would refer you to photographs submitted by Douglas Watt on 23rd September as part of his objection.

As local farmers we accept that agricultural landscapes will change but we question if this is the right place for this development. The site is detached from the steading clusters and is not sensitively located nor characteristic of this rural area. The land is prime agricultural land (Grade 2 class), it has been under productive cereal production for many years contributing to food security so the full 46 hectares of the site and range will be lost to this purpose. This is not a site preferred for such development.

Environmental Impacts – Flood Risk, Air Quality and Odour.

The site is known as the Moss of Meathie indicating a strong tendency for flooding and is far from ideal for this type of development. This has presented the applicant with challenges exemplified in the exchanges with SEPA and numerous re-submitted mitigation plans which as noted above will involve considerable reformation of the surrounding land and add considerably to the visual effects. SEPA have now after two years removed their objection on flood risk grounds, but the major mitigation required will have significant consequences. It is our view that with unpredictable rainfall concentrations in future, inherent flood risk on this site remains and there is no certainty that mitigation measures will not be overwhelmed and result in pollution of the land and fragile drainage system.

Air Quality, Odour and the Local Environment will not be enhanced by this development as referred to in more detail above in relation to manure management, and in the absence of any reliable predictors apart from experience, in all likelihood existing adverse odour effects will be exacerbated. This new application would triple the capacity of this type of unit within this locality and all the associated environmental effects on residents including dust pollution from the shed ventilation and odour effects from manure handling and spreading. In this respect, the proximity of Lochlands Holiday Park and Ladenford Den Guide Campsite should not be overlooked. All these cumulative environmental effects must be properly considered.

Sometimes it is clear from the outset that a site is not suitable for what is proposed, and we believe Easter Meathie is such a site.

Traffic and Amenity

The increased heavy traffic required by the development will place a considerable burden on the small local road network and particularly on the access shared with residents. With this increase comes both safety and environmental effects. The local road network also has a high amenity value as it forms part of the Forfar Path Network and the Circuit of Lour promoted for both cyclists and walkers. They are regularly used by residents of Forfar, local walking groups, visitors and residents of the Lochlands Holiday Park. On this point we would refer you to the comments from Mrs Frances Martin and Dr Peter Cargill submitted on 8th and 9th October respectively.

The Planning Framework - ALDP and NPF4

We have studied the new NPF4 document recently adopted by the Scottish Government. It initiates a significant change in the framework of Scottish Planning Policy from a broad perspective, but apart from some specific headline changes in emphasis which do not

directly relate to this application, the detail does not depart from the requirement for a balanced approach to whether a proposal is acceptable as a whole. The desired outcome is still 'the right development in the right place' and that unacceptable development, irrespective of its purpose, should not be permitted. There is no lessening of the protection for the environment which if anything has been considerably strengthened. At the foot of Page 18 covering Rural Revitalisation, it recognises that "environmental quality is a key asset for rural areas, Policies 3,4,5 & 6 ensure that natural assets are protected and enhanced". The balancing exercise for decision makers essentially therefore remains unchanged; factors for and against this development still need to be carefully weighed in the balance of planning judgement.

In terms of ADLP policies therefore we would contend that the Easter Meathie proposal is not compatible with policies DS1, DS3, DS4, PV6 and PV20. We also note that under your ADLP policy F12, Balmashanner Hill is defined as an area as not permitted for development to protect the open character and landscape value. It is noteworthy that the applicant has not included a view of the development from the south facing slope of Balmashanner Hill.

The applicant's most recent document in consideration of NPF4 (20th February) assumes a great deal and totally disregards the finer points for interpretation under the individual policies. Policies 5, 14, 22, 23, 26 and 29 are relevant to this application and all contain points where this application diverges from the policy intent. Although both ADLP and NPF4 are generally supportive of agricultural diversification, there is no suggestion in either that support has such presumption not to be tempered against site suitability and any consequent adverse effects. Although the Easter Meathie application will be considered as agricultural diversification, it should be borne in mind that this application proposes the enlargement of an existing diversification from which the applicant already benefits. Even Lour Farms recognise that policy does not suggest an 'agriculture free for all', and that proper regard must also be accorded to the quality of the landscape, site location, rural neighbours, residential and the general amenity particularly so close to Forfar. We sincerely hope that Angus Council will make their own judgement on the detailed compliance of this application in this location. The extensive amendments and mitigation proposals have not provided reassurance and only serve to confirm the inherent unsuitability of the Easter Meathie site.

I repeat that I have managed Lour Farms for over 30 years and that it does not come naturally to impede the aspirations of a neighbouring farmer who we have worked alongside for many years. However, the implications for our locality from our neighbour's proposals are so adverse that it is necessary to very firmly oppose the Easter Meathie application.

We do not feel that it is appropriate for us to appear at the Committee Hearing as our case has been fully articulated in two submissions and by our own experts. We therefore ask that both planners and decision makers will give all the points raised by Lour Farms careful consideration and apply the weight they deserve in your deliberations as the planning process concludes.

Yours faithfully

Mr. M.W Cumming For and on behalf of Lour Farms Proprietor, Mr B.E.E. Smith

Application Summary

Application Number: 21/00602/FULM

Address: Land West Of Easter Meathie Farm Bungalow Lour Forfar

Proposal: Erection of two 32,000 capacity free-range hen sheds, feed silos, egg packaging facility,

vehicular access, access tracks, drainage, landscaping and associated works.

Case Officer: Ed Taylor

Customer Details

Name: Mrs Jane Brown

Address: Easter Meathie Bungalow Forfar

Comment Details

Commenter Type: Member of Public

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:Dear Sir/Madam,

Reference: 21/00602/FULM

Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping.

My objection relates to The Flood Compensation Non-technical Summary, produced by the applicant which was placed on the Planning Portal on 27 Sept 2023.

I wish to object to the conclusion stated on page 8 of the summary regarding the extensive 'cut and fill' requirements of SEPA.

I am objecting to the conclusion that the images produced do not need to be updated as earthworks are already shown in the image. However, there will be additional excavations which are not shown, therefore the images must be updated and redone.

Furthermore, the current photomontages do not reflect the significant changes to the landscape due to the flood compensation measures. They do show the visual impact of the swales and bunds.

They do not show the impact of the bare earth in the scratch area from 64,000 hens. They omit the impact of the solar panels, and the unknown visual impact of the heat exchangers and storage areas.

They do not present the view from the most obvious viewpoint from the north on the Forfar Path Network.

The quality of the montages are extremely misleading and should be resubmitted incorporating all of the points above, in realistic weather conditions. The quality of the montages is extremely poor and they fail to reflect the visual impact of industrial sheds in such an attractive arable setting.

Finally, the present montages are extremely misleading and it is of great importance that the points raised are addressed and accurate, clear montages are resubmitted.

Yours faithfully,

Jane Brown



27 October 2023

The Planning Department, Angus Council, Angus House, Orchardbank Business Park, Forfar DD8 1AN

Dear Sirs,

Reference: 21/00602/FULM

Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping.

The applicant recently lodged the document 'The Flood Storage Compensation Non-technical Summary' (21_00602_FULM-NTS_-_FLOOD_STORAGE_ADDENDUM-3427646) and stated on page 8 that 'Updated photomontages are unnecessary as they already address the more impactful and long-term effects of the proposal, including the sheds and the required in-fill platform, which will create a discernible visual change'.

- ❖ I wish to object to the applicants' contention that the earthworks required by SEPA are 'relatively minor works' which do not require new photomontages.
- ❖ I would also like to draw the Department's attention to the fact that the layout plans submitted to SEPA as part of the granting the applicant's Pollution Prevention and Control permit for these hen sheds [SEPA PPC Part A Permit application, granted on 21 April 2023 (reference PPC/A/5003791) see https://consultation.sepa.org.uk/permits/ppc-a-5003791-easter-meathie-ppc-application/results/eastermeathiefinalpermit.pdf] are inconsistent with and differ significantly from the details lodged in the Council's Planning Portal. If the applicant is to rely on the plans submitted to SEPA, then this information must be made available in the Planning Portal to allow the public to pass comment.
- ❖ The PPC permit also significantly understates the potential size of the scratch areas around the sheds, which will isolate the sheds in a circle of bare earth and become an eyesore on the landscape.
- ❖ I will also demonstrate that the images used in the photomontages are misleading in terms of the colour of the materials used and the significant impact that this will have on the views across the rural landscape.

These large, industrial-style hen sheds will be placed in rolling open countryside, devoid of any cover, where the main viewpoints will be from the north, looking down on the buildings and the extensive ranges. It is an attractive rural landscape, visible for many miles around and the elevated position of the industrial buildings will make them extremely prominent. In addition, any other features on the ranges will be clearly visible for some distance and it is important that the buildings and significant features on the ranges are correctly modelled to allow due consideration of their impact on an otherwise untouched rural vista.

This combination of the earthworks, the altered layout, the size and colour of the scratch areas, the incorrect colours used in the montages and the poor quality of the original photomontages will have a significant detrimental effect on the visual representation of these hen sheds and it is imperative that revised, accurate and reliable photomontages are produced

Flood Compensation earthworks

For the layman, the applicant's Flood Storage Compensation plans are not easy to follow, only showing cross-sections, but they appear to indicate that the sheds' base requires to be raised approximately 1.5 metres above the northern range's floodplain, whilst the applicant has to excavate a section of the land to the west of the sheds by up to 5.8 metres [section E-E].

This involves digging out and redistributing 7187m³ of earth [approx. 11,000 tonnes]. These are not insignificant quantities and will significantly alter the land profile, whilst the large depression to the west of the sheds will further emphasise the height of the banking for the sheds and make the sheds appear more prominent in the landscape.

As this is all very difficult to visualise in 3D, it is essential that a more easily understood visualisation is provided.

Given that the western excavation appears to take it below the 99.5 metre flood plain level, water can be expected to frequently lie in this area, as this southern part of the field is the first place to be flooded in even moderate rains.

I will be submitting further objections concerning the frequency and extent of flooding in the northern range and the increased propensity to flood now that the trees have been stripped from the southern slopes above the proposed sheds' location - see also **Appendix 4**.

Furthermore, it can be assumed that this western area will form part of the bird's scratch area, exposing the bare earth, despite the report's contention that

'... naturalisation of the ground as ranging habitat following completion, the visual impacts are considered short-term and minor in nature'. The scratch areas can only make the alterations more visible.

Even if the slopes of the excavation are not stripped by the hens' ranging, it is very probable that a scratch area will be established above the excavation, resulting in earth being swept into the excavated area when the steep southern slopes above experience the heavy rainfalls that are becoming more common these days. Mr

Brown, the previous owner of the farm, reported in one of his submissions objecting to the development that it was not uncommon for earth to be washed down the southern slopes. The new, excavated area will be an excellent receptor for such earth movements from the exposed scratch areas.

As such, the prominence of the banking and the buildings will be further emphasised by the visual impact of the scratch areas, which is addressed in another section below.

The angle of the northern edge of the banking on the new plan appears to be much sharper than that shown in the original montage.

In addition, it is not possible to see the extent or shape of the proposed cut of the banking on the south side of the shed, which will receive additional soil from the cut and which will have a profound effect on the ability of the hens to 'free range'. It appears that it will be very steep. Will the birds be issued with climbing equipment?

These alterations are substantial and will significantly the visual impact of this proposed development. As such, they must be reflected in a revised photomontage.

Altered layout

The 'Detailed Layout Plan: Easter Meathie Free Range Egg Farm' shown on page 25 of Appendix I of the applicant's SEPA Pollution Prevention and Control permit [referred to above][see also Appendix 1B] is reproduced below and it will be seen that the layout of the buildings and the use of swales and their positioning has been altered from the details submitted through the Council's Planning Portal.

Buildings

The storage silos have been moved from the outside walls to beside the packing station and the packing station has been enlarged, both in width and length, whilst external bins and a standby generator have been added to the clutter. It is also noted in the body of the PPC application [and in the applicant's submission-Easter Meathie EIA Process and Manure Management Statement 3349469] that the drying of the birds' manure will be carried out by heat exchangers and held in temporary storage but there are absolutely no details on this system or storage areas or of any potential impact on the external structure of the sheds. The solar roof panels noted in the EIA have been completely omitted.

Revised montages should be produced to reflect these changes and the revised plans submitted to the Planning Portal.

Swales and Drainage

Again, in the Detailed Layout Plan the drainage and swales have drastically changed from the detail provided in the Planning Portal [see 21/00602Fulm, Drainage and Foul Water arrangement 3212817]. The wetland, filter strip and bund appear to have disappeared [or have they?] and the single swale running east/west is replaced by 2 swales of an undefined size or height, running north/south. It is specifically noted in section 5.3, page 11, of the Surface Water Drainage of the PPC Draft Decision Document that

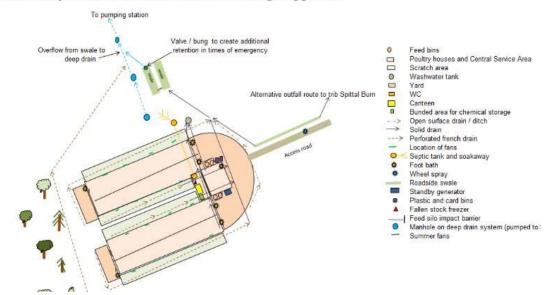
'As the swales are located on the range area and the lower range area is known to be closer to the winter water table level, the proposed depth of the swales is less than that recommended in the CREW Rural SuDS Guide. There is a need for the range area to remain as dry as possible to avoid attracting wild birds to standing water and therefore the applicant designed shallow swales with increased surface area'.

The significance of this is that the open water in the enlarged swales will be highly reflective and an obvious feature in the landscape, visible over a wide area. To show how visible these swales will be, I have attached pictures in **Appendix 1A**, showing recent flooding of the range, virtually where the swales will be, highlighting how visible the water in these swales will be, even on a dull, rainy autumn day.

As a significant feature, the swales should be included in any photomontage and more information provided on their size and construction.

'Detailed Layout Plan: Easter Meathie Free Range Egg Farm' - see also Appendix 1B

Detailed Layout Plan: Easter Meathie Free Range Egg Farm



The above plan, referred to in the above text, is shown on page 25 of Appendix I of the applicant's SEPA Pollution Prevention and Control permit

For better resolution, see page 25 of the PPC permit at https://consultation.sepa.org.uk/permits/ppc-a-5003791-easter-meathie-ppc-application/results/easter-meathiefinalpermit.pdf

Scratch areas

The 'Detailed Layout Plan' identifies very small scratch areas around each shed. If these were the only scratch areas required to qualify for free range accreditation, then there would seem to be little point in the large ranges which are stipulated. The reality is that the scratch areas will be extensive and, being bare earth, will ring the sheds for some distance, increasing the prominence of the sheds and making them highly visible from a greater distance.

I would point to the applicant's current hen shed at Craignathro, housing 32,000 hens as an indication of what will happen.

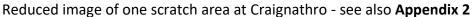
I have attached pictures in **Appendix 2**, taken in August 2021, of the impact of 32,000 birds accessing both sides of the single shed.

This shows the ground stripped to the bare earth for an area extending to between 30 to 50 metres around the shed.

This application is for 2 similar sized sheds, but with a very limited scratch area between the 2 sheds. This middle area will be divided by a fence, so one would presume that the majority of the birds will move to the external scratch areas, therefore 32,000 birds will be accessing only one side versus the 16,000 of the current shed.

One can only assume this will result in a much greater area of land being stripped back to the bare earth, forming a huge blot on the landscape.

As a very large and significant feature, the probable scratch area should be included in any photomontage.





Images used in the current photomontages

No information appears to be provided as to the proposed construction materials or their colour and reflectivity. The only information that we have is that shown in the photomontages.

The images used in the montages are very dark and appear a bit indistinct. The walls are a relatively light but dull khaki green whilst the roofs are almost black. The silos are a dull, non-reflective metal, as are the doors. All is dull, under a very depressing and ill-lit winter sky.

Coincidentally, the images and colouring are virtually the same as the montages in an almost identical application prepared for Cononsyth farm by the same agent, Cogeo, as used by Craignathro Eggs [see 21/00337/FULM | Erection of two 32,000 capacity free-range hen sheds | North Mains Of Cononsyth Farm, Arbroath].

The Cononsyth sheds have, despite considerable controversy, been recently completed, so we can compare the reality, on a normal day, with the model.

For copyright reasons, I cannot reproduce either the Craignathro or the Cononsyth application images, but suffice to say, the khaki green walls are now a very dark green, whilst the dark roofs are now a bright metallic. See the photograph below.

Recently constructed 64,000 bird hen sheds at Cononsyth farm



These sheds are totally different to the images shown in both applications. As such, they will be much more visible, over a greater area. The Easter Meathie application sits in an extremely open landscape, devoid of any screening, with viewpoints looking down on the sheds, whose roofs will reflect in any level of sunlight and become a focal point in the landscape.

In **Appendix 3**, I have enclosed pictures of the current 32,000 bird Craignathro hen shed and it is immediately obvious how similar the Craignathro shed is to the recent Cononsyth construction, how much more visible it is and how different it is from the model in the photomontages.

It is clear that the images in the photomontages are totally unrealistic and new montages should be produced to accurately reflect the reality of the situation, particularly when combined with the extensive scratch areas noted above.

Below is an image taken from a 3 kilometre distance, of the Craignathro shed, showing how reflective and bright a standard metal roof can be.



Woodland on the top of Fothringham Hill

It should also be noted that since the application was lodged in August 2021, the wooded area to the south of and above the proposed Easter Meathie sheds has been felled, leaving an exposed hillside which will only increase the prominence [and flood risk] of the sheds in the open countryside.

This increased exposure should be reflected in new photomontages.

I have included before and after pictures in **Appendix 4.**

Technical assessment of the quality of the photomontages

On 11/10/21 an independent technical assessment by Diana Royce, on behalf of Lour Farms, of the applicant's photomontages was placed on the Planning Portal.

She noted, amongst other things, that -

- the montages are based on the very outdated and superseded LI Guidance 01/11 and that only 3 viewpoints are provided, which is insufficient for a major development of this scale in such an exposed position. More viewpoints, such as from the rising ground to the north, incorporating the Forfar Path Network, are necessary to fully assess the impact of the proposed development. [An alternative viewpoint from the Forfar Path Network is shown in Appendix 1A 1.1]
- the montages lack any real detail, any idea of the external building materials, any natural lighting or the final colours of the finished structure. The sheds appear as an amorphous black shape which does not give a true understanding of how the structure will appear in the landscape.
- in the viewpoint from Mosside Road, the batter linking the raised site base with the existing track is not shown.
- the photovoltaic panels which can be distinctive features and very reflective in certain light conditions and are planned for the south-facing roofs of each shed are not shown on any of the photomontages.
- the LI Guidance 06/19 specifies that baseline photography should be based on good quality imagery, in good, clear weather wherever possible to show a worst-case scenario in all cases. The SNH Guidance similarly requires good visibility, clear skies and clear air to allow for sufficient contrast between the different elements in the landscape.
- the model used for this development is therefore of a very low standard and the photographic imagery submitted is very low quality and has not been secured in good clear weather conditions, resulting in images that are extremely dark with unacceptably low levels of visibility.

The photomontages used for this development are therefore of a very low standard. The lack of detail, colouring, missing elements, insufficient viewpoints and poor and inappropriate photography fail to provide an adequate impression of the proposed development in situ.

I hope that it can be concluded from the information presented above, that the photomontages attached to the applicants EIA are totally unsuitable for their purpose and could be considered misleading.

It is therefore essential that the photomontages are replaced by more appropriate and realistic montages to allow a proper consideration of the visual impact of these extremely large units and the effect of 64,000 birds on the ranges.

Yours faithfully,		
Douglas Watt		

Appendix 1A - impact of reflection of open water in the swales - the water south of the first pylon is effectively where the swales will be.

1.1 Looking south from Mosside Road at a signpost indicating the Forfar Path Network, at the junction of Craignathro road - 26/10/23



1.2 Similar view, looking south, as the EIA viewpoint 1 on Mosside Rd photomontage. The floodwater, in a similar location to the proposed swales, can be seen in the middle of the picture, despite the rain, low cloud and water on the lens - 26/10/23 **See comments below**



Comment

These pictures are provided to show that even in the worst of conditions, the water held in the proposed swales will be clearly visible and on a normal summer day will be extremely reflective and highly visible.

The eye will inevitably be drawn to the swales, from all locations, as they will be in complete contrast to the surrounding countryside

The swales will even be visible from the A90, as the picture [1.3] below, shows

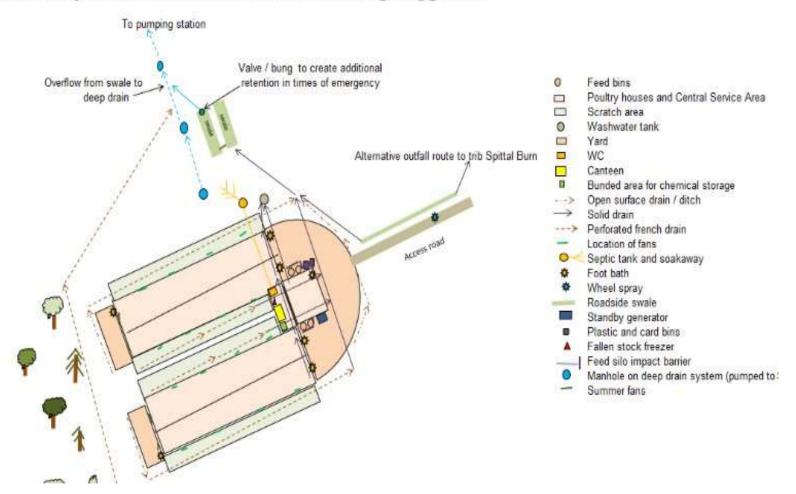
To truly reflect the impact of the open water in the swales, the water held in the swales must be included in any photomontage



Appendix 1B

The plan is shown on page 25 of Appendix I of the applicant's SEPA Pollution Prevention and Control permit For better resolution and additional details, see page 25 of the PPC permit at https://consultation.sepa.org.uk/permits/ppc-a-5003791-easter-meathie-ppc-application/results/eastermeathiefinalpermit.pdf

Detailed Layout Plan: Easter Meathie Free Range Egg Farm



Appendix 2 - Scratch areas at Craignathro Eggs 32,000 bird hen shed - August 2021

To indicate how extensive and visible the scratch areas will be around the proposed Easter Meathie sheds

2.1 Scratch area on east side of hen shed, looking north from farm track



2.2 Scratch area on west side of hen shed, looking north from farm track



2.3 Aerial view of hen shed from Google Earth - exact date is not available but it was taken well before the August '21 pictures above.

It shows the extent and visibility of the scratch area even when not as intensive or extensive as the pictures above.



This view is no longer available on Google Earth as the aerial view was updated in 2023 and was taken when the hens were locked in due to bird flu.

Appendix 3

As explained in the covering letter, these pictures are included to show what real, recently constructed hen sheds look like, in comparison to the poorly constructed models presented in the Craignathro Eggs and Cononsyth Farm hen shed applications.

The images in the applications show differently coloured and reflective materials to those actually used, details are missing, there is a lack of any real detail, any idea of the external building materials, any natural lighting or the final colours of the finished structure. The sheds appear as an amorphous black shape which does not give a true understanding of how the structure will appear in the landscape.

The actual constructions will be much more visible than the images in the montages and will sit prominently in the open, rural landscape. New montages are required to show the impact of these industrial buildings

Copyright rules prevent the actual images used in the applications being presented for easy comparison but can be found on the Planning Portal

3.1 Recently constructed hen sheds at Cononsyth - Sept'23

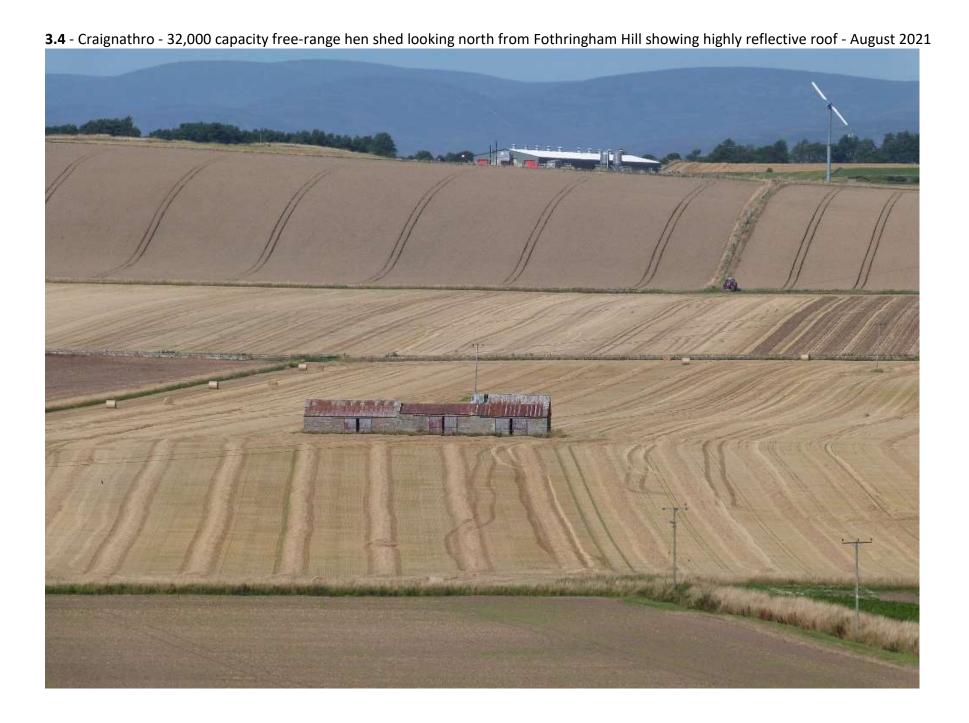


3.2 - Craignathro - 32,000 capacity free-range hen shed from the south east access road- August 2021. Note the light colour and the bright, reflective quality of the roof



3.3 - Craignathro - 32,000 capacity free-range hen shed from the north east - near Balmashaner House = August 2021

Page 3 of 4



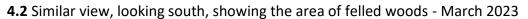
Page 4 of 4

Appendix 4

Felling of the trees on Fothringham Hill to the south and above the proposed site of the sheds

4.1 Proposed site of the sheds, May 2021 showing the 'original' woods on the top of Fothringham Hill - looking south from the start of the farm access road.







Comments

The felling of the trees has opened up the landscape, making any construction much more prominent and visible, in an area with little or no natural cover.

The removal of the trees, which used to act as a natural soak-away, has also increased the volume and velocity of rainwater washing down the southern slopes, increasing the propensity to flood the range and shift earth down the slope.



31 October 2023

The Planning Department, Angus Council, Angus House, Orchardbank Business Park, Forfar DD8 1AN

Dear Sirs,

Reference: 21/00602/FULM

Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping.

I wish to object to the applicant's Flood Storage Addendum-3427644 lodged on 27 September, 2023.

When the applicant submitted their Environmental Impact Assessment regarding the *Flood Storage Addendum* [FSM], this was the first meaningful documentation regarding such matters to be added by them to the Planning Portal since 11 January 2022, when their last document to try to address flood management on a recognised flood plain [marked on maps as the Moss Lands of Meathie], - *Appendix 13.6 - Flood Risk Assessment Appendices - Updated*, was submitted. This appendix included references to mitigation proposals along with wetlands and swales. SEPA were apparently unhappy with the proposals contained in Appendix 13.6 and effectively maintained an objection until the submission of the FSM on 27 September 2023.

However, the FSM deals solely with the 'cut and fill' requirements for flood compensation and there is no indication in the Planning Portal whether or not any part of Appendix 13.6 is still applicable and how it will impact on the parts of the northern range which flood heavily and regularly.

In addition, the information in the Planning Portal takes no account of the substantial alteration to the hydrology of the area following the extensive felling of the trees on Fothringham Hill, which occurred after the hydrology reports were prepared, and which appears to have increased the volume and velocity of water flowing off its steep slopes on the southern part of the range.

The proposed 'cut and fill' is merely a flood compensation proposal, <u>not a flood</u> <u>prevention scheme</u>, so one can assume that the northern range will continue to

flood regularly and more heavily as a result of the felling of the trees and the increased rainfall that we are experiencing.

I have included pictures and text in this objection to illustrate the frequency, extent and depth of the recent floods since November 2022, along with details of the tree removal.

I hope this information will convince the Department of the total unsuitability of this site for free-range chickens and the dangers of attracting wild birds which might be carrying avian flu.

However, there is another, significant, outstanding problem with this application in that SEPA has granted a Pollution Prevention and Control Part A permit (reference PPC/A/5003791) for these hen sheds, based presumably on information from the applicant, which differs considerably from the Planning Application in terms of building layout, drainage arrangements and size of range.

I can find no information in the planning application on the Planning Portal regarding the PPC permit, these changes and their potential impact. I am therefore uncertain as to just what I am objecting to.

It is also stressed in the PPC permit application documentation that 'there is a need for the range area to remain as dry as possible to avoid attracting wild birds to standing water', presumably because of the avian flu risk. This requirement, which is not noted in any of the application documentation, recognises the impact of avian flu which became so prevalent after the application was first submitted.

None of this is noted in the Planning Portal and I have commented on the differences below, but it is obviously an important part of the planning application process and therefore the planning application should not progress until this situation is clarified and the correct information is placed on the Planning Portal.

A. Recent flooding and the impact of tree felling on Fothringham Hill

When people are told of the proposed hen sheds at Easter Meathie, also known as the 'Moss Lands of Meathie', their first reaction is usually - '...but it floods!'. Mr Brown, the previous owner for 30 years before he sold the farm in 2016, states in his objections that ponds will form every year on the flat land, about 60 metres below the proposed sheds, and, in flood conditions, the water from the 1,000 acres that drain into the Spittal Burn [see Appendix 1.B.7] before it leaves Easter Meathie, will cause the burn to overflow.

Indeed, the applicant's own photomontages, prepared in December 2020, show lying water in the fields.

This position has now been exacerbated by the felling of the trees on Fothringham Hill, above the proposed sheds, in early 2022, after the EIA hydrology reports had been submitted.

Severe flooding has been noted since that time and pictures of some of the worst occasions are shown in *Appendix 1*, but these are certainly not the only occasions.

The picture below, of the extensive flooding in November 2022, from near Viewpoint 3 [Meathie Church ruins], looking north, gives an indication of the extent of the flooding. The hen sheds will be at the southern edge of the floodwater. This level of flooding was repeated almost exactly on 20th October 2023 and, to a lesser extent, on the 8th and 28th October 2023.

Note particularly in the picture below, the overflowing of the Spittal Burn which can be seen running East/West across roughly the centre of the picture. It is calculated that the depth of flooding across most of the floodwater is approximately 2ft, using the height of the manhole covers as a guide - see also Appendix 1.



It is also very probable that, given the extent of the 'cut' area as part of the proposed flood compensation scheme, the 'cut' area will flood during even modest flooding events. Flood water will then completely surround the raised platform on which the sheds will sit. This could last for several days, making it impossible for the hens to access any part of the northern range and leaving the ground saturated and unsuitable for hens but very attractive for wild birds.

More pictures are provided in **Appendix 1**, which also includes pictures of many wild birds settling on the water over the prolonged period that it takes for the waters to drain away, but, of course, the ground is still saturated and wild birds will continue to be attracted. This is contrary to all the requirements for bio-security as part of the prevention of avian flu.

Indeed, avian flu and climate change [responsible for Storm Babet?] and their implications, are not mentioned or accounted for in any part of the EIA, which must be a significant omission.

As noted above, it is specifically stated in section 5.3, page 11, of the Surface Water Drainage of the SEPA PPC Draft Decision Document [see https://consultation.sepa.org.uk/permits/ppc-a-5003791-easter-meathie-ppc-application/user-uploads/easter-meathie-free-range-egg-farm-draft-decision-document-.pdf [that

'As the swales are located on the range area and the lower range area is known to be closer to the winter water table level, the proposed depth of the swales is less than that recommended in the CREW Rural SuDS Guide. There is a need for the range area to remain as dry as possible to avoid attracting wild birds to standing water and therefore the applicant designed shallow swales with increased surface area'.

It should also be noted that, as a result of the position of the swales shown in the PPC permit, the depth of flooding on the fields and the overflowing of the Spittal Burn, into which the swales are supposed to drain, the swales will not be able to drain at all and will be swamped by the floodwater.

Appendix 2 gives 'before' and 'after' pictures of Fothringham Hill, showing the extent of the tree removal and the steepness of the slope above the sheds. Given the probable increase in volume and velocity of water now flowing from Fothringham Hill, the proposed southern perimeter drains for the sheds in the PPC permit will be overwhelmed by water and soil, reducing or negating their effectiveness and allowing the sheds to be flooded, much as happened at the existing hen shed at Craignathro and reported in the Press & Journal on 22 Oct 2023, [below]. The Craignathro shed sits on the top of a hill rather than at the bottom, as at Easter Meathie, and must be much better placed to resist flooding, yet flood it did. The P&J stated -

'Poultry farmer Matthew Steel from Forfar has spent most of the weekend in his hen laying sheds as 128mm of rain fell from Thursday through to Saturday evening. He has 32,000 hens in one shed, with 16,000 each side of a packing station. As a result of the floods, he has lost 60 hens.

He said: "We worked all through the night with an irrigation pump and tanker to keep on top of the water as the shed ended up being flooded. It has been mucked out with help from local farmers as most of it is done with a shovel.

"The shed is rebedded and now <u>we just have to hope it hasn't contracted a disease</u> from the flood waters."

It must have been very unpleasant in the shed given that the hens appear to have been in 'lockdown' for the past year, the need for personal protection equipment and the overwhelming of bio-security measures. The stress on the birds must also have been significant. I understand that the sludge tanker was also required at Craignathro at the beginning of October when the rainfall was much less, although Easter Meathie was still flooded but to a lesser extent - see **Appendix 1.C** Has Matthew got the resources to drain and dig out 3 large hen sheds, all at the same time?

No recognition has been given to the greatly altered hydrology of the site and the threat to bio-security. The applicant should be obliged to submit a review of the consequences of the tree removal and the impact of avian flu and climate change.

In addition, because of the regular flooding in the past, there are 2 submersible pumps on the northern edge of the range which can pump 7,000 tonnes of flood water into the Spittal Burn every 24 hours. Little, if no mention is made of these pumps in the EIA and its appendices, and there appears to be no consideration of the implications of them failing at a crucial time.

B. Differences between the planning application and SEPA's Pollution Prevention and Control Part A permit (reference PPC/A/5003791)

The details of the **final permit**, granted on 21 April 2023, can be found at https://consultation.sepa.org.uk/permits/ppc-a-5003791-easter-meathie-ppc-application/results/eastermeathiefinalpermit.pdf

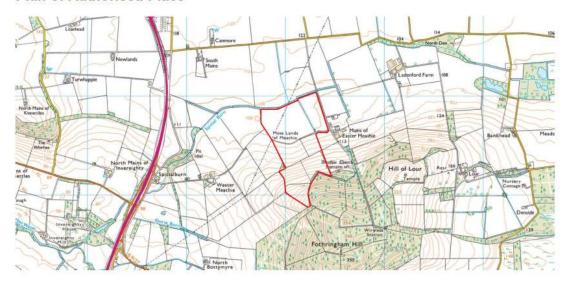
A copy of the **PPC Draft Permit Conditions** upon which the final permit is based can be found at https://consultation.sepa.org.uk/permits/ppc-a-5003791-easter-meathie-ppc-application/user_uploads/easter-meathie-free-range-egg-farm-draft-permit-conditions.pdf and is referred to in the comment on swales and wild birds, above

The information in this permit is not available on the Planning Portal, yet the details in the permit differ in several significant aspects to the planning application, so it has to be asked, what documentation will the applicant rely on in building the hen sheds?

The PPC permit - Appendix1 [pages 24 & 25] shows the range boundaries in the 'Authorised Place' and a 'Detailed Layout Plan: Easter Meathie Free Range Egg Farm'

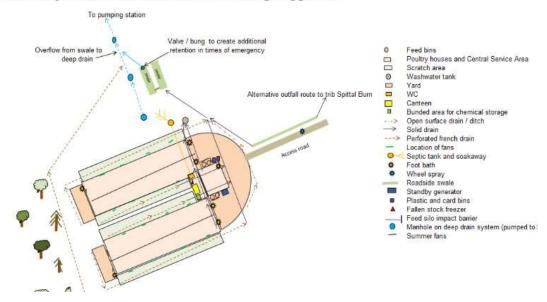
The range boundaries, shown below in the 'Authorised Place' map, differ from the range boundaries set out in the planning application, as an additional area has been added in the south-west corner. The initial PPC range plan was even more significantly different in the first iteration of the PPC application.

Plan of Authorised Place



The 'detailed' layout plan below also differs from the information in the planning application.

Detailed Layout Plan: Easter Meathie Free Range Egg Farm



This is the only plan that we now have of the applicant's current layout and, despite its name, it is woefully lacking in detail, scale, contours or elevation. It would seem that, compared with details in the planning application, the storage silos have been moved from the outside walls to beside the packing station, the packing station has been enlarged, both in width and length, and external bins and a standby generator have been added to the clutter around the packing station.

The drainage and swales have drastically changed from the detail provided in the Planning Portal [see 21/00602Fulm, Drainage and Foul Water arrangement - 3212817]. The wetland, filter strip and bund appear to have disappeared [or have they?] and the single swale running east/west has been replaced by 2 swales of an undefined size or height, running north/south.

Furthermore, whilst there is mention of a heat exchanger system in the Manure Management Plan in the Planning Portal in December 2022 and in the PPC permit, no detail has been provided on the proposed system and the potential impact on the external profile, noise generation or potentially harmful emissions.

Given the number of changes to the planning application since it was first submitted, the differing information in the PPC permit, the rejection of proposals in EIA, the changes in the hydrology and the impact of avian flu and climate change, the planning application should be comprehensively revised and resubmitted to allow a balanced review of the project and some assurance be given as to how it is envisaged that it will all turn out.

It is clear that the information in the Planning Portal requires substantial revision and correction and that the Department should seriously review the practicality of placing industrial-sized hen sheds on ground that floods regularly and heavily. The application, in its current form, must be rejected

Yours faithfully,

Douglas Watt

Appendix 1 - Flooding of the proposed northern range area

The proposed northern range floods regularly to a greater or lesser extent and lying water is frequently visible throughout the year. Pictures of some of the more significant events are provided below.

The 2 most significant recorded events were on 17 November 2022 and 20 October 2023, with lesser events on 8 and 28 October 2023.

On 17 November 2022, it had rained heavily for only a couple of days with a dry period before that - Appendix 1.A

20 October was part of Storm Babet but the rainfall seemed lighter than November 2022, although a bit more constant - Appendix 1.B

8 October did not seem to be a large rainfall and was preceded by good weather - Appendix 1.C [Note the photos of wild birds in the flood water]

28 October followed Storm Babet. The rainfall was not particularly heavy - Appendix 1.D

Appendix 1.E photograph from the 1980s, showing a curling rink on the northern range.

The positioning of the flood water is also important as it occurs almost exactly where the hen sheds are to be placed and, as noted in the accompanying letter, with the proposed cut flood compensation section, the hen sheds will be encircled by flood water to the north. This, combined with the fencing required for the access road, will completely cut off the hens' access to the northern range for prolonged periods and leave their ground saturated. It is also very likely that the 2 proposed, parallel swales will be completely swamped by these levels of flooding.

This appendix should be read in conjunction with **Appendix 2** regarding the impact of tree removal on Fothringham Hill.

The pictures are only to record the levels of flooding and the alteration to the woods. The original, full-quality pictures are available for inspection.

The pictures below show the Easter Meathie range location and the position of the sheds. See also the 'Authorised Place' plan in the accompanying letter



View of site looking south from public road



View of site looking east from A90

1.A - Flooding - 17 November 2022

1.A.1 Looking north west over the northern range from the slope of Fothringham Hill around 18 November, 2022.



The flooding covers almost all of the northern range adjacent to the proposed sheds, in all directions.

Note also the flood level of the Spittal Burn which runs East/West across the centre of the picture. The burn has flooded and the pump house north of the pylon is swamped.

Easter Meathie farmhouse is on the right of the picture and the proposed access track can be seen running east/west. This is a similar, but wider view to that shown in the 'Meathie Church Photomontage -3209737' from Viewpoint 3.

There was substantial rainfall at Easter Meathie on and around the 16th and 17th of November 2022, with the rain easing off on the 17th.

Given my limited mobility, I was not able to take any pictures of the flooding until the 18th November and then only from the farm road with my phone camera, although a more agile 3rd party walking along the 'tree line' above and to the south of the range area was able to provide additional pictures showing the width of the flooded area [pic 1.A.1 above].

The visibility is obviously not great, given the weather and my inability to access better vantage points, but the pictures below clearly show the extent of the flooding of the fields and the Spittal Burn for almost the entirety of the northern range, the flooding persisting for a number of days. The flooding was deep enough to cover the base of the northern pylon and one of the manholes to the left of that pylon, for the large drain which runs the length of the proposed range. This smaller manhole is approx. 2 ft in height and is normally clearly visible above the surface of the fields. It can clearly be seen in the accompanying photograph on a 'normal' day [see pic 1.A.7] and in the 'Meathie Church Photomontage -3209737'.

It has been noticeable that frequently, when we now get rain, it is of a monsoon like intensity and the ground struggles to absorb it, often resulting in the flooding of particular areas and large areas of standing water and saturated ground. I can only assume it is as a result of the climate change that we are experiencing and these changing weather patterns should be factored into any computations and conclusions.

It is also highly likely that even slightly elevated levels of rainfall will lead to standing water across the range, which would be unacceptable





1.A.3 View looking west from the farm access road, to the flood water covering the proposed northern range. The proposed location of the sheds is at the leftmost edge of the flood water. Near the right edge of the picture, the small brown block of the pump house can be seen, indicating the north edge of the range, so the full length of the range is flooded - **18 November 2022**.



1.A.4 A closer view of 1.A.3, showing that the flood water has covered the manhole near the pylon on the right, as well as the base of the pylon - **18 November 2022.** Probable depth-2 ft. The top of the much larger, middle manhole can be seen to the left of the central power pole.



1.A.5 Another view of the flooded northern range, westward from the farm access road, showing proposed shed access track on the left, centre - **18 November 2022**



1.A.6 Similar westward view as 1A.3 from the farm access road on the following day, **19 November 2022**, showing the slightly reduced flood level which has exposed the base of the rightmost [northern] pylon.



1.A.7 A 'normal' view of part of the northern range, looking north, in **January 2021**. Note the extent of the lying flood water.



This shows the pump house and manhole on the bank of the Spittal Burn to the right of the pylon. The smaller manhole to the left of the pylon, was covered by flood water in November 2022. In the centre is the much larger, middle manhole, the top of which which can be seen in 1.A.4. The proposed access track to the sheds can be seen running right to left near the middle right of the picture, alongside the black, plastic-covered bales, which can also be seen in the 'Meathie Church Photomontage -3209737'.

1.B - Flooding 20 October 2023

1.B.1 Looking northwest from near Easter Meathie farmhouse. As in Nov'22, the entire length of the range up to the Spittal Burn is flooded.



While some areas such as Brechin suffered badly, I do not feel that the rainfall of Storm Babet at Easter Meathie was as intense as that of November 2022, but was more constant. However, it produced very similar results, in extent and depth, to the flooding of November 2022 - see 1A

1B.2 Looking south from Mosside Road. Note the width of the flooding, the swamped Spittal Burn, the cleared area of trees on Fothringham Hill, at the top left of the picture, with the stubble field below - **20 October 2023**.



1B.3 Looking west from farm access road. Flooding covers the entire length of the range, as in Nov'22 - **20 October 2023**

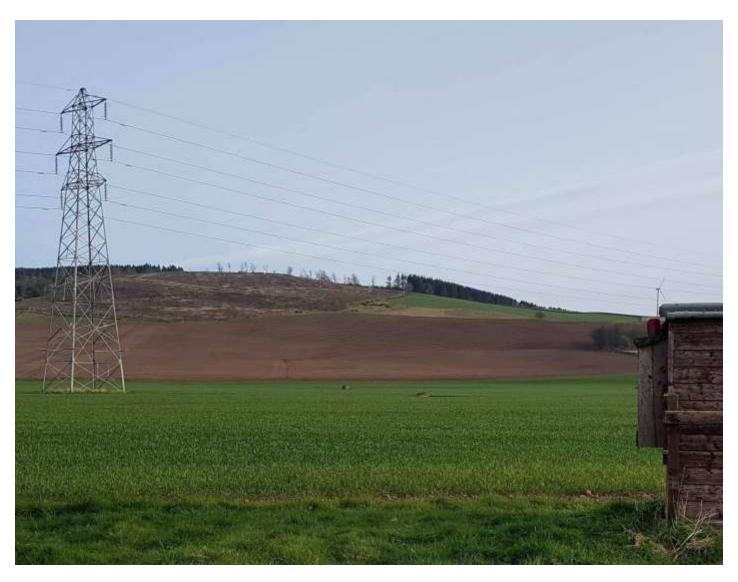


1B.4 Enlarged view of the base of the right hand pylon seen in 1.B.3 [above], showing just the top of the cap on the small manhole to the left of the pylon, indicating a depth of about 2ft.



1.B.5 View of the small manhole, looking south from the pump house at the Spittal Burn. It is to the right of the pylon, almost in the centre of the picture. The larger, 'middle' manhole can be seen behind and to the left of the small manhole. There is a crop growing in the fields which masks, to some extent, the height of the manhole, which is about 2ft - **15 April 2023.** *Note the hilltop stripped of trees.*

See also the manholes shown in **1.A.7**, above. The small manhole is to the left of the pylon.



1.B.6 Flooding of the Spittal Burn - 20 October 2023

The Spittal Burn runs along the northern boundary of the northern range and all the drainage from the north and south ranges will flow into the burn. If the burn overflows, the ranges cannot drain and will flood. The 1,000 acres around Easter Meathie drain into the Spittal Burn. The burn also flooded on 18 November 2022.



1.B.7 A view of the Spittal Burn in more normal circumstances



1.C - Flooding - 8 October 2023

1.C.1 - A not particularly rainy period, with dry weather before and after the flooding. About half the range has flooded with the greatest flooding occurring in front of the area where the hen sheds will be [to the left of the picture]. The east/west line seen on the slope in the top left of the picture is where the 'cut' of the proposed cut and fill will be.



1.C.2 Wild birds seen on the flood water. As it was quite a nice day, the birds were across the full extent of the flood water - 9 October 2023



1.D Flooding - 28 October 2023

1.D.1 A moderately wet day, one week after Storm Babet. More than half the range has flooded



1.D.2 Spittal Burn - 28 October 2023



1.E

To give a flavour of how long this area has flooded, below is a picture from a book on local history - 'Inverarity, a Parish Patchwork', produced by the Kinnettles and District Heritage Group.

The picture has the caption - *Curlers on Easter Meathie ice* (mid 1980's) - indicating that this area must have flooded to a sufficient depth to provide a viable curling surface. Given the tree line and slope in the background, it would appear that the rink would have been within the proposed northern range.



Curlers on Easter Meathie ice (mid 1980's).

Appendix 2 - Felling of woods to the south of and above the proposed site of the sheds

2.1 Proposed site of the sheds, **May 2021** showing the 'original' woods on the top of Fothringham Hill, to the south - looking south from the start of the farm access road.



2.2 Similar view, looking south showing the area of felled woods - March 2023



Comments

The trees on the hill used to act as a natural soak-away. Their removal in 2022 will have increased the volume and velocity of rainwater washing down the southern slopes, increasing the propensity to flood the range and shift earth down the slope.

The felling of the trees has also opened up the landscape, making any building or alterations much more prominent and visible, in an area with little or no natural cover [see pics 2.4 and 2.5].

2.3 Closer view, looking south, up to the area of felled woods from the spot where the east end of the proposed sheds will be - **March 2023**



2.4 View from near the A90, looking south east to Easter Meathie farm to give an indication of the lack of cover and the **slope of the hill** from the now deforested hill top down to the range. The proposed sheds would lie along the base of the large, sloping yellow field [see also 2.1] - **May 2021**



2.5 Deforested area from near the A90, looking south east - March 2023



Page 3 of 3

From: Douglas Watt

Sent: 02 November 2023 15:11

To: Ed Taylor < Taylor E@angus.gov.uk >

Subject: Reference: 21/00602/FULM Application of Craignathro Eggs Ltd. and PPC Part A permit -

reference PPC/A/5003791

Dear Mr Taylor,

Reference: 21/00602/FULM Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure

I am writing with regard to the current planning application 21/00602/FULM, submitted by Craignathro Eggs, and their recently granted SEPA Pollution Prevention and Control (PPC) Part A permit (reference PPC/A/5003791).

I have recently submitted two further objections which include mention of the discrepancies between the planning application documentation and the PPC permit and I would like to ascertain the Department's position on this permit within the planning process, as the permit differs from the planning application in relation to range size, building layout and the drainage and treatment of surface and waste water.

The details in the permit also seem to imply that the plans and strategy noted in Appendices 13.6 and 13.5 will no longer apply, yet there appears to be no mention of these changes on the Planning Portal documentation so that anyone relying on the information in the Planning Portal would not be aware of what appear to be the 'final' proposals in the permit.

I am unclear as to what I should be commenting on and what will happen should the application go before the Development Standards Committee.

What documents will the Committee use to assess the planning application?

I hope that you can clarify the matter as I wish to be clear as to what documents I should rely on in any presentation to the Committee.

Can I also ask if any details and evaluations will be provided regarding the heat exchange system mentioned in the EIA Process and Manure Management Statement, the Clarification on Manure Management and in the PPC Draft Decision Document. I cannot find any details on the type of system, its installation, the storage provision for the dried manure or any potential noise levels or emissions.

[In the PPC Draft Decision Document it states 'During the determination of this permit, the Applicant notified SEPA of an amendment to the PPC application. Each poultry house will be fitted with a heat exchanger. This had not been included in the initial application. Heat exchangers have been added to satisfy planning requirements for manure management by the local Council.']

I would be most grateful if you would acknowledge receipt of this email.

With many thanks,

Douglas Watt

White Cottage, Easter Meathie Farm, Forfar DD8 2LF

28 November 2023

The Planning Department, Angus Council, Angus House, Orchardbank Business Park, Forfar DD8 1AN

Dear Sirs,

Reference: 21/00602/FULM

Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping.

I wish to draw the Department's attention to the failure of the applicant to properly consider alternative locations for their proposed hen sheds.

It is stated in section 4.4. ['Alternative Sites'] of the applicant's Environmental Impact Assessment, that - 'Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 requires an EIA Report to include a description of the reasonable alternatives that have been considered by the developer, including an indication of the main reasons for selecting the chosen site.'

The applicant also stated in the document – *Easter Meathie - Consideration of NPF4 - Ref* 3364508; dated 20th February 2023, submitted as part of their evaluation of NPF4 - in page 3, under the heading of **Policy 5, Soils** -

"Criteria within Policy 5 confirms that development will be supported where there is a locational need for the development and no other suitable sites. A review of alternative sites was requested by Angus Council, and a response provided in November 2021. All land within the Applicants lease was assessed with Chapter 4 of the EIA Report clearly stating the reason for the final location of the shed buildings".

There is <u>no report dated November 2021</u>, <u>or any other date</u>, in the Planning Portal referring to the review of alternative sites.

Chapter 4 of the EIA refers only to Easter Meathie and does not review all the applicant's landholding.

The applicant's Environmental Impact Assessment and other related documents only provide information on, and only considers, Easter Meathie, contrary to Schedule 4 of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017.

Lour Farms, in their letter of 7 March 2023, set out the landholdings of Lour Farm and Craignathro Farms, and this shows an area of approximately 275 acres at East Ingliston, owned by Craignathro Farms.

Matthew Steel is a Director of Craignathro Farms and Craignathro Eggs and is identified by Companies House as the 'person with significant control' over both companies and is therefore able to influence any decisions relating to both Craignathro Farms and Craignathro Eggs.

As such, any evaluation of potential sites should have included an assessment of the suitability of East Ingliston farm, which I would consider to be a much more suitable site for the hen sheds.

The most important difference between Easter Meathie and East Ingliston is that East Ingliston is not on a floodplain. SEPA flood maps show a 10% chance of the banks of the Dean Water flooding each year compared to a similar chance of the entire northern range flooding at Easter Meathie, but the vast majority of East Ingliston is shown to be free from flood risks.

I have lodged an objection with the Planning Department showing the extent and depth of the regular, substantial flooding of the northern range at Easter Meathie.

In addition, East Ingliston would not require the moving of 11,000 tons of earth, an upgrade of the local roads and would provide additional bio-security by moving the sheds further away from the Craignathro's 32,000 bird hen shed. It would also remove the risk of wild birds landing on a recognised floodplain. Much as at the Craignathro hen shed, the sheds could be effectively concealed in the folds of the land and farm employees would be readily available to manage any issues.

East Ingliston farm is about 1.5km west of the Glamis Junction on the A90, with the A94 Glamis Road running along its southern boundary and the Dean Water from Forfar Loch, along its northern boundary [see location map and aerial view in appendix 1].

The A94 provides excellent access to the farm [much better than the unclassified road at Easter Meathie] and East Ingliston will be supplied with electricity and water, as at Easter Meathie. It is a gently rolling landscape with secure access. The nearest residential receptor is potentially Leckaway Smithy in the south-east corner [possibly 580 mtrs and away from the prevailing winds]. However, sensible siting of the hen sheds in the folds of the ground in the northern part of the landholding would allow the landform to block any view of the sheds. Indeed, given appropriate siting, the sheds would only be really visible from Nether Drumgley, about 870 metres to the north, and, given the prevailing south-westerly winds, there are no residential receptors down wind, for some considerable distance.

At East Ingliston, the land quality appears to be split almost 50/50 between grades 2 and 3.1. Judicious placement would minimise the use of grade 2.

With regard to Easter Meathie, the applicant makes few comments on the land quality but the applicant submitted, as part of their evaluation of NPF4, the document – *Easter Meathie* - *Consideration of NPF4* - *Ref 3364508; Submitted on 20th February 2023.* On page 3, under the heading of **Policy 5, Soils**, they state -

"While there is no peat present within the development boundary at Easter Meathie, the land is classed as prime agricultural land (Class 2)", which is superior to that at East Ingliston. All the land at Easter Meathie is cultivated with a variety of crops and provided a good living for the previous owner.

There seems to be little practical difference between the land holdings except that East Ingliston is not so steep, does not flood as extensively and has better access from the A94.

I have set up a table in Appendix 2 to compare what I consider to be the main requirements of both sites and it is clear that, on balance and taking all the factors into account, East Ingliston is a more appropriate site.

The applicant should be asked to provide a comprehensive assessment of all the land under their ownership and to assess the advantages of locating the proposed hen sheds at East Ingliston.

Yours faithfully,

Douglas Watt

In the attached appendices I have provided:

Appendix 1 - location map and aerial view of East Ingliston, with approximate boundaries

Appendix 2 - A comparison of the requirements of each site

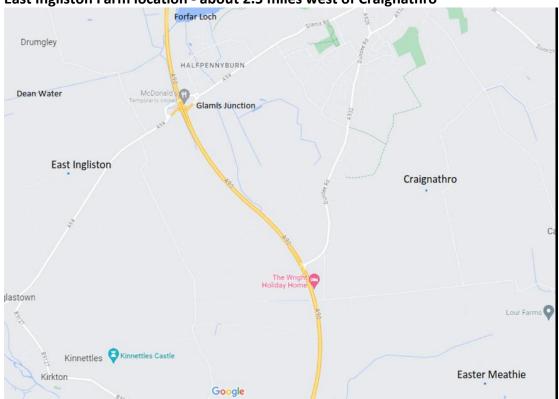
Appendix 3 - Views of parts of the East Ingliston landholding

Appendix 4 - Views of the access to East Ingliston from A94

Submitted by email

Appendix 1 - location of Easter Ingliston

East Ingliston Farm location - about 2.5 miles west of Craignathro



East Ingliston Farm boundaries - Google Earth



Appendix 2 - Comparison of facilities and requirements between Easter Meathie and East Ingliston

Easter Meathie

East Ingliston

Is the site on a flood plain which floods extensively and regularly	Yes Extensive photographic evidence submitted to Angus Planning Department
Does site require to be raised and levelled	Significant - 11,000 tons to be moved
Need for a retaining wall/bund	Essential and sizable
Stability of soil on any slope	Poor due to potential volume and velocity of water from the steep bare slopes above the range
Access for HGVs and vehicles to handle feed, waste and eggs	Public road is narrow, in poor condition and will require substantial upgrade. Access to sheds adequate after some work to build access track
Suitable slope angles for range	Southern slope is very steep, northern range floods
Supply of drinking water for hens and staff	Available at farm but requires to be brought to sheds
Three-phase electricity supply required	Available at farm but requires to be brought to sheds
40ha land area of range (min)	Available

No 10% chance of annual flooding along banks of Dean Water
Probably some required, but considerably less than Easter Meathie [EM]
May be required but considerably less than EM
No significant slopes
Access from public road [A94] is excellent. Work will be required to create an adequate farm track to the sheds
Quite gentle contours with flat land available
Available at farm but requires to be brought to sheds
Available at farm but requires to be brought to sheds
Available

Comparison of facilities and requirements between East Ingliston and Easter Meathie [continued] Easter Meathie East Ingliston

Access for all 16,000 bird divisions	Available when not in flood. Flooding cuts off access to the northern range
No access routes for vehicles or pedestrians	None
Biologically secure	Yes
Site management and animal husbandry	Adequate
Odour and emissions from sheds	Residential receptors are only 350mtrs directly downwind and in full view of sheds
Noise from fans and delivery vehicles	Residential receptor 350mtrs directly downwind and all vehicles will pass directly in front of their front door
Solar panels	South facing but affected by Fothringham Hill in the low suns of Winter & Spring
Possible infection from other hens sheds	Craignathro, 1.95km north

A۷	vailable
No	one
Ye	es .
Ac	dequate
58 fro	otential nearest residence possibly 30 mtrs but to SEast and hidden om sheds. No significant receptors r over 1km downwind
wi	oise - as for odour, above. Vehicles Ill pass through an already busy, rge farmyard area, upwind of the se
	ossible for south-facing panels with open aspect all year round
No	one seen within a 2km radius

With regard to **land quality**, East Ingliston appears to be split almost 50/50 between grade 2 and 3.1. Judicious placement could minimise the use of grade 2 land.

Regarding Easter Meathie, the applicant has stated that - "While there is no peat present within the development boundary at Easter Meathie, the land is classed as prime agricultural land (Class 2)". All the land at Easter Meathie is cultivated with a variety of crops and provided a good living for the previous owner.

There seems to be little practical difference between the land holdings except that East Ingliston is not so steep, does not flood to nearly the same extent and has better access. It does not have any significant residential receptors which could be affected by any emissions and the land contours would reduce the visibility of the sheds and enhance security.

Appendix 3 - views of East Ingliston landholding

3.1 View looking south across Dean Water (from near Nether Drumgley) to the northern slopes of East Ingliston land holding. Farm buildings are behind the 2 trees, just right of centre, on the ridge running east/west. Note the brown, ploughed field which will be seen in other views.

June 2023



3.2 Further view looking south across Dean Water (from near Nether Drumgley) to the northern slopes of East Ingliston land holding.

June 2023



3.3 View of the slope of the northern landing holding, looking south west across the Dean Water, identified by the 2 small bushes in the foreground. Taken near the bridge over the Dean Water on the road from A94 to Nether Drumgley. June 2023



3.4 View looking north east from the junction of the farm access road and the A94. The top of the ploughed field, identified in the above pictures, can be seen between the legs of the pylon.

June 2023



3.5 View looking north from the A94, near Leckaway Smithy, towards Nether Drumgley. Again, the top of the ploughed field can be seen running east/west along the centre line of the picture.

June 2023



3.6 A closer view of the above picture [3.5], looking north. Nether Drumgley can be clearly seen over the ridge of the ploughed field (seen in the earlier pictures, above). June 2023



Appendix 4 - East Ingliston access road

4.1 East Ingliston access road, looking north from its junction with the A94 *Google maps*



4.2 Access to fields from the first part of the access road, looking north. *Google maps*



4.3 Entrance to farm track [on left] to fields, just past the first corner of the access road [see 4.2], looking east. *Google maps*



White Cottage, Easter Meathie Farm, Forfar DD8 2LF

23 November 2023

The Planning Department, Angus Council, Angus House, Orchardbank Business Park, Forfar DD8 1AN

Dear Sirs,

Reference: 21/00602/FULM

Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping.

In earlier letters of objection I have noted that this planning application differs in several significant aspects from the **Pollution Prevention and Control Part A permit** issued by SEPA on 21 April 2023 - *reference PPC/A/5003791*. This permit must be read in conjunction with the **PPC Draft Decision Document** which formed part of the PPC application and which provides additional information related to but not included in the final permit.

In my earlier objections I had provided links to these documents, but because they do not form part of the planning process, they are not available on the planning portal. Accordingly, anyone viewing the planning application could be unaware of these discrepancies and would be unable to comment properly on the implications of the changes.

I have therefore attached both the **final PPC permit** and the **PPC Draft Decision Document** for the Department's information, along with my **summary of the principal differences**.

What is concerning is that the quality of the planning application has been very poor and substantial, valid objections have been raised by independent experts during the planning process. The independent experts have not been able to challenge the quality and veracity of the new assumptions and conclusions contained in the PPC permit which must be contrary to the rules and spirit of the planning application process.

Gavia Environmental Ltd, commissioned by Lour Farms to provide an independent review of the hydrological assessments, submitted their report on 18th February 2022 [21/00602/Fulm, Gavia Environmental on behalf of Lour Farms-3263743.pdf]. This report raised many issues, particularly regarding the quality of the calculations used in the application and the drainage arrangements. The applicant has not lodged any response to these comments or provided any update on their proposals in the planning portal but has completely changed their initial drainage solutions during the PPC application process.

This implies that they recognise that their proposals in the planning application were inadequate and, unless the planning application is updated with the revised proposals, the current planning application must fail.

What is even more surprising is that in the applicant's own Environmental Impact Assessment Report - Main text [ref 3206444] it states in section 4.4, page 16 that - 'Drainage and water treatment processes required as part of the development further restricted development within the flood plain, with the sensitive nature of this ground unsuitable for swales or tank solutions. Developing within this flood plain would result in the loss of valuable flood storage, increasing the risk to the detriment of the area'.

The proposed PPC swales are firmly in the centre of the flood area.

In addition, the applicant now intends to include heat exchangers in the hen sheds yet there is no information in either the planning application or the PPC permit on the heat exchangers or how they will be used

The applicant has presumably agreed these changes with SEPA who seem content to allow this permit to be issued despite not conforming with the planning application. The information contained in the PPC permit is considerably less than that submitted under the planning process, making it difficult to ascertain just what exactly is being proposed.

It is therefore unclear what the applicant intends to do or how any issues will be resolved.

The applicant should be required to bring the planning applicant in line with the PPC permit and provide the required additional information for comment on the planning portal or resubmit their PPC application based on the information in the planning application.

Yours faithfully,

Douglas Watt

Below - summary of the principal differences between the PPC permit [reference PPC/A/5003791] and planning application 21/00602/FULM

Also attached -Pollution Prevention and Control Part A permit and PPC Draft Decision Document

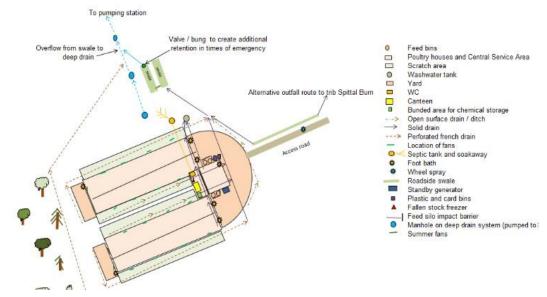
Summary of the principal differences between the PPC permit [reference PPC/A/5003791] and planning application 21/00602/FULM:

Revision of drainage arrangements Alterations to the building and processes Alterations to the range area Heat exchangers

The PPC Part A permit - Appendix1 [pages 24 & 25] shows the range boundaries in the 'Authorised Place' and a 'Detailed Layout Plan: Easter Meathie Free Range Egg Farm'

The 'detailed' layout plan below differs from the information in the planning application.

Detailed Layout Plan: Easter Meathie Free Range Egg Farm



This is the only plan that we now have of the applicant's current proposed layout and, despite its name, it is woefully lacking in detail, scale, contours or elevation, making it difficult to accurately position the main swales etc.

Buildings

It would seem that, compared with details in the planning application, the storage silos have been moved from the outside walls to beside the packing station, the packing station has been enlarged, both in width and length, and external bins and a standby generator have been added to the clutter around the packing station.

Drainage and swales

The drainage and swales have been substantially changed from the detail provided in the Planning Portal [see 21/00602Fulm, Drainage and Foul Water arrangement - 3212817 - 2^{nd} August 2021]. The large area of wetland, filter strip and bund shown in the planning application appear to have disappeared and the single swale running east/west has been replaced by 2 swales of an undefined size or height, running north/south.

The swales appear to be placed beside the 'middle' manhole of the drainage culvert in the above plan. I have previously submitted an objection due to the level of flooding in the

northern range where the swales are placed, in which the middle manhole is shown completely surrounded by flood water to a depth of probably 2ft., as below.

Northern range flooding 18 November 2022 showing flood around middle manhole



In section 5.3, page 11, of the Surface Water Drainage section of the SEPA **PPC Draft Decision Document** it states that

'As the swales are located on the range area and the lower range area is known to be closer to the winter water table level, the proposed depth of the swales is less than that recommended in the CREW Rural SuDS Guide. There is a need for the range area to remain as dry as possible to avoid attracting wild birds to standing water and therefore the applicant designed shallow swales with increased surface area'.

As shown above, in any flooding the swales will be swamped and be unable to discharge into the Spittal Burn, completely negating the purpose of the swales. The flooding and subsequent lying water will also attract wild birds, contrary to the condition noted above.

See picture, below, of wild birds on flood water - 9 October 2023



Scratch areas -In section 5.3 it is also noted that -

Scratch areas will be underlined with an impermeable membrane to ensure that all scratch area drainage is captured and directed to the swales. Drainage will be conveyed to the swales via solid pipes. The first flush principle is acceptable provided the swales are well maintained. A check dam will be provided in the second swale to retain flows for a short period following a storm event.

As I have also pointed out in earlier submissions, the indicated scratch areas are ludicrously small and will, in fact, extend much further and be swamped by any flooding, even light flooding, making the proposed drainage arrangements ineffective.

Flood compensation

The PPC permit was granted in April, yet the flood compensation 'cut & fill' arrangements were only approved by SEPA on 9th October and would appear to seriously impinge on the proposed PPC permit drainage arrangements due to the depth of the cut and the flood plain level. However, because of the complete lack of information, it is not possible to calculate the impact.

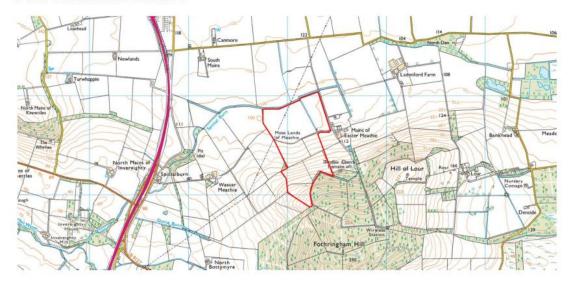
Flood compensation is not the same as flood prevention and the northern range area will continue to flood.

The drainage and other issues of the north range are discussed in detail in the submission by Gavia Environmental Ltd on 18th February 2022 [21/00602/Fulm, Gavia Environmental on behalf of Lour Farms-3263743.pdf], but, as noted in page 1, no opportunity has been provided to comment on the arrangements in the PPC application.

Range boundaries

The range boundaries, shown below in the 'Authorised Place' map [Appendix 1 [page 24], differ from the range boundaries set out in the planning application, as an additional area has been added in the south-west corner.

Plan of Authorised Place



Heat exchangers and litter management

There seems to be confusion as to whether heat exchangers are to be fitted within the hen sheds.

These heat exchangers had not been mentioned in the initial planning application but they are mentioned in the applicant's manure management plan and, more specifically, in the document in the planning Portal, 24 Jan 2023, titled **Clarification on Manure Management** ref - 3368020.

This records an email from Dave Anderson [Cogeo], to Ed Taylor Angus Council, on 18 Jan 2023, in which he states

'We'll come back to SEPA ASAP, but if they need to <u>we'll get the PPC amended to include</u> <u>for a specific drying mechanism</u>. Currently, it is not required because there is no ammonia impact, but our Client intends to install a drying system.'

In the same document, this is followed by an email from Eilidh Clark [Cogeo], to Ed Taylor, Angus Council, on 24 Jan 2023 where she states

'Easter Meathie Farm, however, <u>will be fitted with heat exchangers</u> that not only generate drier air but that air is directed onto the manure belts to effect even faster drying and to a higher level of dry matter. These systems are recognised as providing 'best available technology'

Furthermore, it is stated in **section 5.2 of the PPC Draft Decision Document** that 'During the determination of this permit, the Applicant notified SEPA of an amendment to the PPC application. Each poultry house will be fitted with a heat exchanger. This had not been included in the initial application. The heat exchanger warms the incoming air, which will be directed onto the manure belts, and result in drier conditions within the poultry house. Heat exchangers have been added to satisfy planning requirements for manure management by the local Council'.

It seems therefore that heat exchangers will be fitted in the hen shed but there is no description of this heat exchanger system, how it will work, how it will be powered, how it will be fitted, whether or not there are external, building implications or if there are any emission or particulate concerns.

Details of the proposed heat exchanger system must be provided in the planning portal.

The details of the **final permit**, granted on 21 April 2023, can be found at https://consultation.sepa.org.uk/permits/ppc-a-5003791-easter-meathie-ppc-application/results/eastermeathiefinalpermit.pdf

A copy of the **PPC Draft Permit Conditions** upon which the final permit is based can be found at https://consultation.sepa.org.uk/permits/ppc-a-5003791-easter-meathie-ppc-application/user_uploads/easter-meathie-free-range-egg-farm-draft-permit-conditions.pdf



Pollution Prevention and Control Part A Permit Intensive Farming

Easter Meathie Free Range Egg Farm

For information on accessing this document in an alternative format or language please contact SEPA by email at equalities@sepa.org.uk

If you are a user of British Sign Language (BSL) the Contact Scotland BSL service gives you access to an online interpreter enabling you to communicate with us using sign language: http://contactscotland-bsl.org/

Every day SEPA works to protect and enhance Scotland's environment, helping communities and businesses thrive within the resources of our planet.

PPC/A/5003791

We call this One Planet Prosperity





Introduction

This introduction does not form part of the authorisation.

Authorisations

Who we are: The Scottish Environment Protection Agency (SEPA) is a non-departmental public body of the Scottish Government. Our purpose is to deliver environmental protection and improvement in ways that, as far as possible, also create health and wellbeing benefits and sustainable economic growth.

Why we issue authorisations: We are responsible for preventing or controlling pollution and improving the environment. One of the tools available to us is the authorisation of activities that present environmental risk. Authorisations give permission for these activities to occur and set conditions that the activities must comply with.

When we issue authorisations: We will issue an authorisation following our determination of an application, when satisfied that the authorised person has put in place measures to protect the environment and is capable of carrying out activities in line with the conditions of an authorisation.

Changes to authorisations: We can amend, suspend or revoke an authorisation in response to changes in legislation, the activities undertaken or authorisation holder performance.

Compliance and enforcement: SEPA Officers may undertake monitoring and inspections to assess compliance with authorisation conditions. All authorisations and inspection reports are publicly available. If an authorised person fails to comply with an authorisation, we may take enforcement action in line with our enforcement policy and guidance.

General information:

Address:	Easter Meathie Free Range Egg Farm Forfar Angus
Description of authorised activities:	DD8 2LF Intensive Farming
Environmental risks SEPA has regulatory powers to control:	The discharge of potentially polluting substances to the air, water and ground.



Notice: Grant of Authorisation

This authorisation has been granted by the Scottish Environment Protection Agency (SEPA) in exercise of its powers under Regulation 13 of the Pollution Prevention and Control (Scotland) Regulations 2012.

Authorisation Number:	PPC/A/5003791
Authorised Person:	Craignathro Eggs Limited Company Number – SC549434 Craignathro Farm Forfar DD8 2LE
Date of Authorisation:	21 April 2023
Authorised Activities:	The operation of an installation where the following activities are carried out: Rearing poultry intensively, and any directly associated activities as further detailed in this authorisation.
Authorised Place:	Easter Meathie Free Range Egg Farm Forfar Angus DD8 2LF
Conditions applicable to this authorisation:	The conditions contained in the schedules of this authorisation. Terms used in this authorisation are, unless otherwise specified, defined in the Interpretation of Terms schedule.



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Schedule 1: The Authorised Person and Activities

Purpose: This schedule places responsibility on the authorised person to ensure compliance with the conditions of this authorisation, and details the activities that can be carried out.

1.1 Duty of Authorised Person

1.1.1 The authorised person must ensure compliance with the conditions of this authorisation.

1.2 Authorised Place

1.2.1 The authorised place and installation is delineated in red as indicated on the plans in Appendix 1.

1.3 Authorised Activities

1.3.1 This authorisation authorises the operation of the installation in Table 1 to carry out the authorised activities at the authorised place.



Table 1: Installation

Stationary Technical Unit:

Two poultry housing units with a capacity of:

a) 64,000 places for poultry in an aviary housing system.

The locations of the housing units are shown as indicated on the plan in Appendix 1.

A ventilation system at each house comprising a combination of mechanical and passive gable inlets, gable outlets, side inlets, roof inlets and roof outlets.

A feed delivery system which utilises augers to supply dry feed from the storage bins to feeding belts located within each house.

A water delivery system which supplies water to livestock via nipple drinkers supplemented with collection cups located within each house.

Activities:

Rearing poultry intensively in an installation with more than 40,000 places for poultry as described in Part A of Section 6.9 of Schedule 1 of the Regulations.

Directly Associated Activities:

Fuel and raw material storage carried out in infrastructure more particularly described below:

- a) A container for gas oil, used as fuel for a back-up generator located as indicated on the plan in Appendix 1; and
- b) A secure refrigerated chemical and medicine store located as indicated on the plan in Appendix 1.



Feed storage and preparation carried out in infrastructure described below:

a) A series of silos for holding feed mix located as indicated on the plan in Appendix 1.

Water storage carried out using infrastructure described below:

a) Overhead tanks located in the Central Services Area.

Handling of slurries and manures carried out using infrastructure described below:

- a) One underground tank used for the collection of washwater effluent from the housing located as indicated on the plan in Appendix 1; and
- b) Manure collection and removal every 2-3 days using conveyor belts and stored in a covered trailer before uplift offsite.
- c) Forced air drying of manure by manure belt ventilation system.

Storage and disposal of fallen stock. This is carried out using infrastructure described below:

a) A secure and vermin-proof dead box. The location of the dead box is shown as indicated on the plan in Appendix 1.

Auxiliary power generation facilities described below:

a) A diesel generator.

Lightly contaminated run off collection, drainage and treatment described below:

a) Swales located as indicated on the plan in Appendix 1.



Schedule 2: General Provisions

Purpose: This schedule places responsibility on the authorised person to notify SEPA of planned cessation of activities, and to maintain adequate funding to appropriately manage the facility in compliance with the conditions of this authorisation.

2.1 Decommissioning

- 2.1.1 SEPA must be notified if there is a planned cessation of all, or any part of authorised activities for any period exceeding 12 months.
- 2.1.2 The authorised person must maintain a decommissioning plan setting out the steps to be taken after final cessation of the authorised activities.

2.2 Resource Efficiency

2.2.1 The authorised activities must be undertaken in a manner that uses resources efficiently and minimises the production of waste.



Schedule 3: Operations

Purpose: This schedule places responsibility on the authorised person to ensure activities are carried out in accordance with required methods of operation.

3.1 Livestock Manure (Slurry and Manure Storage)

- 3.1.1 The authorised person must ensure that all slurry and manure management systems within the authorised place are designed, constructed and managed in accordance with the SFIR with the aim of preventing, or where that is not possible, minimising emissions from those systems.
- 3.1.2 All external conveyors handling litter or manure must be enclosed.
- 3.1.3 All trailers transporting manure must be covered prior to leaving the site.
- 3.1.4 The freefall height of manure during the loading of any vehicles must be kept to a minimum at all times to minimise the emission of particulate matter into the air.

3.2 Waste Handling and Storage

- 3.2.1 The authorised person must maintain a record of the location, estimated quantities and types of all wastes stored within the installation.
- 3.2.2 Residue and waste materials must be handled and stored as described in Table 2.



Table 2: Waste Handling and Storage

Description of Waste	Location of Storage	Method of Storage	Maximum Authorised Quantity	Storage Conditions
Vaccine bottles	Locked and refrigerated storage container	Locked and refrigerated storage container	N/A	Locked and refrigerated
Cardboard	Waste collection area designated as indicated on the plan in Appendix 1	Wheelie bin	N/A	Outdoors on hard standing area
Plastic Containers & Wrappings	Waste collection area designated as indicated on the plan in Appendix 1	Wheelie bin	N/A	Outdoors on hard standing area
Chicken Carcasses	As indicated on the plan in Appendix 1	Vermin proof dead bird bin	N/A	Locked vermin proof storage shed



- 3.2.3 Disinfectant footbaths must not be allowed to overflow.
- 3.2.4 The spent disinfectant contained in foot baths and wheel washes must be stored securely prior to disposal.
- 3.2.5 Containment must be:
 - (a) provided for foodstuffs to prevent spillages and minimise waste; and
 - (b) protected from collision damage.
- 3.2.6 All excess spray and liquid run-off from any equipment used for the automatic disinfection of vehicles must be collected and contained.

3.3 Livestock Diet Selection and Use of Feedstuffs

- 3.3.1 The authorised person must provide livestock with a diet which minimises the excretion of:
 - (a) nitrogen; and
 - (b) phosphorus

whilst ensuring the correct dietary needs of the livestock are met.

3.3.2 The authorised person must keep a record of the diets fed to livestock over the growing cycle.

3.4 Housing Design and Management

- 3.4.1 Any water used for cleaning within housing must be collected and stored in a secure container until export from the authorised place can take place.
- 3.4.2 The contents of the collection tank must be removed without delay upon cessation of cleaning operations.
- 3.4.3 Drinkers must be designed and operated to prevent leakage.
- 3.4.4 The authorised person must implement and maintain a system to record the number of animal places and movements.

3.5 Site Drainage

- 3.5.1 The drainage system at the authorised place must be maintained.
- 3.5.2 The authorised person must maintain plans that detail the site drainage system including subsurface infrastructure.



- 3.5.3 Unless otherwise stated in this authorisation, individual source emissions of roof water and drainage from yards must be treated prior to discharge into the water environment.
- 3.5.4 Treatment facilities for emissions from roof water and drainage from yards must be designed, constructed and maintained in accordance with the 'CREW Rural Suds Design and Build Guide'.

3.6 Liquid Storage

- 3.6.1 All oil storage facilities must meet equivalent technical standards to those set out in the Water Environment (Miscellaneous) (Scotland) Regulations 2017.
- 3.6.2 Pesticides and veterinary medicines must be kept in a store that is:
 - (a) resistant to fire;
 - (b) capable of retaining leakage or spillage;
 - (c) dry, frost-free; and
 - (d) secure against unauthorised access.



Schedule 4: Emissions

Purpose: This schedule requires the authorised person to ensure specified emission limit values are not exceeded.

4.1 Emission Limit Values – Air

4.1.1 Emissions of substances from the installation to the air, must not exceed the relevant limits specified in Table 3.

Table 3: Emission Limit Values – Air

Parameter	Emission Limit Value (Units)	Emission point reference number/location	Monitoring	Frequency
Nitrogen N	0.8 kg N/ animal place/ year	Laying hens	Calculation by using a mass balance of nitrogen and phosphorus based on the feed intake, dietary content of crude protein, total phosphorus and animal performance or Estimation by using manure analysis for total nitrogen and total phosphorus content	Annually
Available Phosphorus P ₂ O ₅	0.45 kg/P ₂ O ₅ / animal place/ year		As above	Annually
Ammonia NH ₃	0.13 kg NH ₃ / animal place/ year	Laying hens in Non caged housing	Estimation using emission factors	Annually
Dust PM ₁₀	N/A	All livestock types	Estimation using emission factors	Annually



4.2 Fugitive Emissions

4.2.1 The emission of any other substance, not specified in Table 3 from the installation must not cause environmental harm.

4.3 Soil and Groundwater

4.3.1 There must be no emission of any pollutants to soil or groundwater from the installation.



Schedule 5: Environmental Monitoring

Purpose: This schedule requires the authorised person to monitor emissions.

5.1 Emissions to Air

5.1.1 Monitoring of emissions to air must be undertaken as specified in Table 3.

5.2 Soil and Groundwater

- 5.2.1 A soil and groundwater monitoring plan must be submitted to SEPA at least three months prior to any monitoring taking place.
- 5.2.2 The soil and groundwater monitoring plan must include:
 - (a) the substances to be monitored;
 - (b) the locations at which monitoring will be carried out;
 - (c) monitoring frequency; and
 - (d) monitoring methodology.
- 5.2.3 Soil and groundwater monitoring must be carried out in accordance with the soil and groundwater monitoring plan.
- 5.2.4 The soil and groundwater monitoring plan must be reviewed no later than six months after each monitoring event. The review should determine whether any changes to monitoring locations, frequency or parameters are required and where changes are proposed, a revised plan must be submitted to SEPA.
- 5.2.5 Groundwater monitoring must be undertaken as specified in Table 5.



Table 5: Groundwater Monitoring Requirements

Relevant hazardous substance	Activity to be monitored	Monitoring and reporting frequency
Ammoniacal Nitrogen (mg/L expressed as N), Nitrate (mg/L expressed as N) and Phosphorus (as orthophosphate)	As agreed in soil and groundwater monitoring plan.	Annually

5.2.6 Soil monitoring must be undertaken as specified in Table 6.

Table 6: Soil Monitoring Requirements

Relevant hazardous substance	Activity to be monitored	Monitoring and reporting frequency
Ammoniacal Nitrogen (mg/L expressed as N), Nitrate (mg/L expressed as N) and Phosphorus (as orthophosphate) and Hydrocarbons	As agreed in soil and groundwater monitoring plan.	At least every 10 years



Schedule 6: Pollution Control

Purpose: This schedule details the minimum environmental standards that must be met at all times. It also ensures that nuisance generated by waste activities is controlled and local communities are protected.

6.1 Emissions

- 6.1.1 Measures must be taken to prevent, or where that is not practicable, minimise all emissions arising from the authorised activities.
- 6.1.2 Offensive odours from the authorised activities as perceived by a SEPA officer must not be emitted beyond the boundary of the authorised place.
- 6.1.3 Noise from the authorised activities, which has a significant impact on the environment, people or property, must not be emitted beyond the boundary of the authorised place.
- 6.1.4 Dust from the authorised activities, which has a significant impact on the environment, people or property, must not be emitted beyond the boundary of the authorised place.
- 6.1.5 Unless specified elsewhere in this authorisation, there must be no individual source emissions from the authorised place to the water environment, air or land.



Schedule 7: Environmental Events

Purpose: This schedule requires actions to be taken in response to any event that has caused or could cause environmental harm.

7.1 Notification to SEPA

- 7.1.1 SEPA must be notified via its pollution hotline contact telephone number as soon as reasonably practicable, and in any case within 24 hours of identification of an event, of any of the following:
 - (a) an event that has caused or could cause adverse impact to the environment or harm to human health;
 - (b) an event that results, or could result, in an emission to the environment that is not authorised; or
 - (c) an event that has caused a breach of a condition of this authorisation.

In this condition, the meaning of 'event' is as defined in the Interpretation of Terms in schedule 9 of this authorisation.

7.2 Management of the Event

7.2.1 All measures that are reasonably practicable must be taken to stop an event and to minimise its effect on the environment.

7.3 Reporting of the Event

- 7.3.1 Within 14 days of an event a report must be submitted to SEPA detailing:
 - (a) the reason(s) for the event;
 - (b) the action(s) taken to stop the event and minimise the impacts; and
 - (c) the action(s) taken to prevent the event from recurring.



Schedule 8: Record Keeping and Data Submission

Purpose: This schedule requires the authorised person to keep records associated with the operation of the installation and submit certain records to SEPA.

8.1 Record Keeping – general requirements

- 8.1.1 All information recorded, kept or submitted to SEPA in accordance with a condition of this authorisation must be:
 - (a) true and accurate;
 - (b) kept until this authorisation is surrendered; and
 - (c) provided to SEPA upon request.

8.2 Resource Utilisation

- 8.2.1 Annual data totals of raw materials, energy utilised, emissions, and waste produced within the installation, must be recorded in the "Systematic assessment of resource use and efficiency template" (IED-T-04).
- 8.2.2 A report detailing a review of resource utilisation at the installation must be submitted every four years. The report must, where possible:
 - (a) identify ways to reduce emissions, the use of raw materials, water used, energy utilised, fuel and waste produced; and
 - (b) demonstrate that resource utilisation is improving at the installation year-on-year.
- 8.2.3 With reference to 8.2.2 (a) "raw materials", "energy" and "fuel" must, as a minimum, include the materials listed in Table 8 in Appendix 2.

8.3 Assessment of Measures

- 8.3.1 At least every two years, an assessment must be undertaken and reported, of all measures used to prevent emissions from the installation to soil and groundwater. The assessment report must include:
 - (a) the details of and timescales for any additional measures that are required to prevent emissions to soil and groundwater.



8.4 Reporting and Notification Requirements

8.4.1 Where any condition of this authorisation requires information to be reported or notified to SEPA, a report or notification must be forwarded to SEPA by the date(s), the period, and the frequency, specified in Table 7.



 Table 7:
 Reporting and Notification Requirements

Summary of information to be reported or notified	Condition	Reporting / notification frequency	Submission	Address to send report to
Notification to cease operation	2.1.1	When required	One month prior to any proposed cessation lasting more than 12 months	registry@sepa.org.uk
Decommissioning Report	2.1.2	As required	Within 6 months of the date of the authorisation	registry@sepa.org.uk
Emissions to air monitoring report	5.1.1	As detailed in Table 3	Annually	registry@sepa.org.uk
Soil & groundwater monitoring plan	5.2.1	As required	Within 3 months of the monitoring taking place	registry@sepa.org.uk
Groundwater monitoring	5.2.5	Annually	Within 1 month of completing the testing required by Table 5	registry@sepa.org.uk
Soil Monitoring	5.2.6	At least every 10 years	Within 1 month of completing the testing required by Table 6	registry@sepa.org.uk
Environmental event notification	7.1.1	As required	As soon as reasonably practicable	SEPA pollution hotline 0800 80 70 60
Environmental event report	7.3.1	As required	Within 14 days of event	registry@sepa.org.uk
Resource Utilisation assessment report	8.2.1	Every 4 years	Every 4 years	registry@sepa.org.uk
Assessment of measures	8.3.1	Every 2 years	Within 2 months of completing the assessments required by 8.3.3	registry@sepa.org.uk



Schedule 9: Interpretation of Terms

For the purposes of this authorisation, and unless the context requires otherwise, the following definitions apply.

Term Definition		
authorisation	The permit granted by SEPA under The Pollution Prevention and Control (Scotland) Regulations 2012.	
authorised activities	The activities and any directly associated activities which may be carried out under this authorisation.	
The holder of this authorisation and person responsible for securing compliance with the conditions of it. Has the same meaning as 'operator' as defined in The Pollution Prevention and Control (Scotland) Regulations 2012.		
authorised place	The geographic location at which the authorised activities may be carried on.	
commissioning	The commencement in operation of the installation or part thereof, for the first time following construction, or after any significant modification or change. It includes: the planning and management of the commissioning or the installation or part thereof; functional testing of equipment; introducing process materials to the plant; resolution of technical and procedural problems; confirmation that all aspects of the plant operate as designed or planned; and confirmation the plant operates within the conditions of the authorisation.	
CREW Rural Suds Design and Build Guide	the Duffy A, Moir S, Berwick N, Shabashow J, D'Arcy B, Wade R (2016). Rural Sustainable Drainage Systems: A Practical Design and Build Guide for Scotland's Farmers and Landowners, CRW2015/2.2	
directly associated activity	Any activity which has a technical connection with the activity carried out in the stationary technical unit and which could have an effect on pollution.	
dust	Particles, of any shape, structure or density, dispersed in the gas phase at the sampling point conditions which may be collected by filtration under specified conditions after	



	representative sampling of the gas to be analysed, and which remain upstream of the filter and on the filter after drying under specified conditions.		
emission	The discharge of substances from a plant into the air or water environment.		
	The mass, expressed in terms of specific parameters, concentration or level of an emission, which may not be exceeded during one or more periods of time.		
emission limit	All air emission limit values are defined at:		
value	(a) a temperature of 273.15K;(b) a pressure of 101.3kPa; and(c) after correction for the water vapour content of the waster.		
	(c) after correction for the water vapour content of the waste gases.		
	(a) Harm to the health of human beings or living organisms,		
	(b) Harm to the quality of the environment, including:		
	(i) harm to the quality of the environment taken as a whole,		
environmental	(ii) harm to the quality of air, water or land, and		
harm	(iii) other impairment of, or interference with, ecosystems,		
	(c) Offence to the sense of human beings,		
	(d) Damage to property, or		
	(e) Impairment of, or any interference with, amenities or other legitimate uses of the environment.		
	Any accident which has caused or could cause environmental harm; or		
event	Any malfunction, breakdown or failure of plant, infrastructure or techniques which has caused or could cause environmental harm; or		
	Force majeure or action taken to save human life or limb.		
hazardous substance	Substances or mixtures as defined in Article 3 of Regulation (EC) No 1272/2008 of the European Parliament on		



	classification, labelling and packaging of substances and mixtures.		
housing	Includes all buildings used to house poultry forming part of the installation.		
	Means any of the following situations:		
	Where an accident occurs which has caused or may have the potential to cause pollution;		
	Where any malfunction, breakdown or failure of plant or techniques is detected which has caused or may have the potential to cause pollution;		
	A breach of any condition of this authorisation;		
incident	Where any substance, vibration, heat or noise specified in any condition of this authorisation is detected in an emission from a source not authorised by a condition of this authorisation and in a quantity which may cause pollution;		
	Where an emission of any pollutant not authorised to be released under any condition of this authorisation is detected;		
	Where an emission of any substance, vibration, heat or noise is detected that has exceeded, or is likely to exceed, or has caused, or is likely to cause to be exceeded any limit on emissions specified in a condition of this authorisation.		
	(a) a stationary technical unit where one or more activities listed in Schedules 1 or 2 of The Pollution Prevention and Control (Scotland) Regulations 2012 are carried out, and		
installation	(b) any other location on the same site where any other directly associated activities are carried out,		
	and references to an installation include references to part of an installation.		
normal operation	Operation of the stationary technical unit excluding start-up and shut-down periods.		



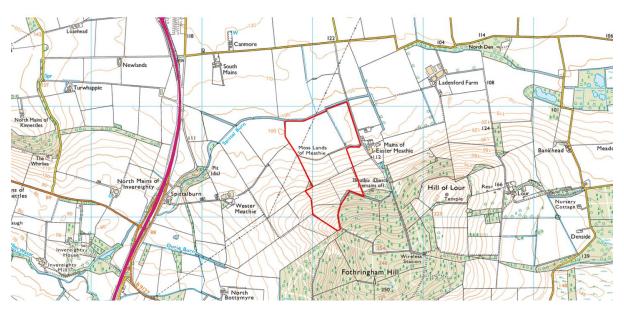
operation	Has the same meaning as in The Pollution Prevention and Control (Scotland) Regulations 2012, A Practical Guide (Part A Activities), Issue 2;	
raw materials Crude or processed material that can be converted by manufacture, processing or combination into a new and product.		
resources	Energy, water and raw materials required by the process.	
scratch area	An area of hardstanding immediately outside of the pop holes, no more than 2m wide, made of concrete or smooth edged stones.	
SEPA	Scottish Environment Protection Agency.	
SFIR	The Standard Farming Installation Rules published by SEPA and dated April 2013 or any subsequent update published by SEPA.	
slurry	Has the same meaning as in the Control of Pollution (Silage, Slurry and Agricultural Fuel Oil) (Scotland) Regulations 2003.	
The Regulations	The Pollution Prevention and Control (Scotland) Regulations 2012.	
water environment	has the same meaning as in the Water Environment and Water Services (Scotland) Act 2003 that is all surface water, groundwater and wetlands; and "surface water", "groundwater" and "wetlands" has the same meanings as in the Act.	

Except where specified otherwise, any reference to an enactment or statutory instrument includes a reference to it as amended (whether before or after the date of the authorisation) and to any other enactment, which may after the date of the authorisation replace or amend it.



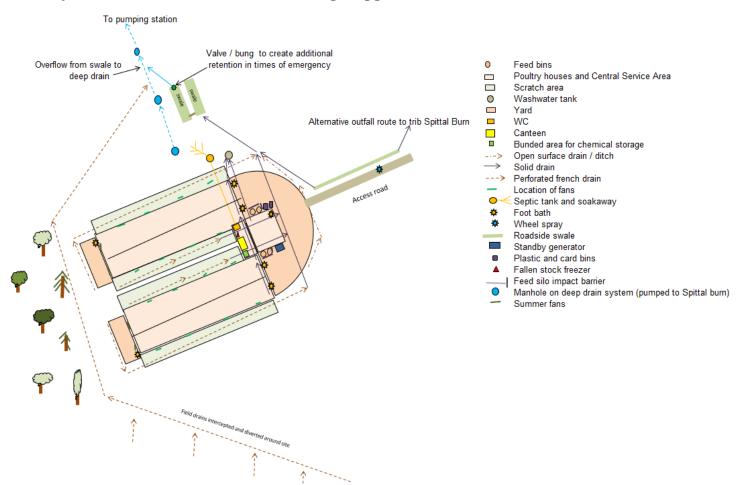
Appendix 1. Authorised Place

Plan of Authorised Place





Detailed Layout Plan: Easter Meathie Free Range Egg Farm





Appendix 2. Resource Utilisation

Table 8: Resource Utilisation Data Recording

Raw materials, energy or fuel	Unit of measurement
Fuel (Gas, oil, diesel, etc)	Litres/m ³
Sawdust/Shavings	Kg
Water	Litres/m ³
Disinfectant/detergents	Litres/Kg
Plastic Wrap	Kg
Electricity	Kw

Explanatory Notes

These explanatory notes do not form part of the authorisation.

Best Available Techniques (BAT):

Regulation 22 of the Regulations specifies that there is a condition of an authorisation, that the authorised person must use the best available techniques (BAT) for preventing, or where that is not practicable, reducing emissions from the installation or mobile plant. This is referred to as the 'general' BAT condition. This condition does not apply in relation to any aspect of the operation of the installation or mobile plant, which is regulated by a specific condition of the authorisation. Examples of aspects of the operation that have not been regulated by specific conditions are management supervision systems, training and qualifications and maintenance in general.

In considering BAT, SEPA would expect the authorised person to have regard to all relevant PPC sectoral or other technical guidance, including process guidance notes published by the Scottish Government.

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V 1

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Craignathro Eggs Limited

Easter Meathie Free Range Egg Farm

PPC Part A Permit Application

PPC/A/5003791

Permit (Application) Number: PPC/A/5003791

Applicant: Craignathro Eggs Limited

OFFICIAL

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OFFICIAL

1 NON-TECHNICAL SUMMARY OF DETERMINATION

The application by Craignathro Eggs Limited is for a new free range egg production farm located on agricultural land northwest of Mains of Easter Meathie. The site is located 3.9km south of Forfar, Angus. The farm will house a total of 64,000 free range laying hens in two new poultry housing units on a multitier aviary system. The site is located at Ordnance Survey national grid reference NO 4610 4660. The permit application is made under Part A of Section 6.9 (a) of Schedule 1 of the Pollution Prevention and Control (Scotland) Regulations 2012.

The poultry houses are designed to minimise ammonia emissions. All walls and roofs will be insulated to retain heat and minimise condensation. The concrete floors will be protected from water ingress by an impermeable damp-course membrane. The south side of the housing units (free range area) will have an interceptor drain, cutting off drainage from higher ground and diverting it away from the poultry houses.

Temperature and humidity are monitored continuously by sensors located within each individual housing unit. The climatic conditions are recorded and adjusted accordingly to achieve optimal conditions for flock welfare and to maintain low moisture content in the litter. Litter will be monitored to ensure that it is friable and loose.

Ventilation will be by means of roof-mounted fan assisted inlet chimneys, with side wall and gable end extraction fans. Duty operation will be via the side wall extraction fans with the gable end extraction fans only operating during warmer weather. Each house will have a total of 16 inlet chimneys, 4 small extraction fans spaced equidistantly along each side and 8 large extraction fans in the gable end. In addition, each house will be fitted with a heat exchanger.

The aviary production system comprises nest boxes and bird perches, and pop-holes in the base of the housing unit so that the birds may roam. Manure collection will be via manure belts that collect manure from underneath bird perches, nesting boxes and drinking and feeding stations. Manure will be removed from the housing units two/three times per week via conveyor to a covered trailer outside the poultry houses. Manure will then be spread to land outwith the installation boundary.

Hens will be introduced at 16 weeks of age and housed for approximately 55 – 60 weeks before the flock is depleted. At the end of each cycle, the housing units will be destocked of birds and all litter and manure completely removed manually into covered trailers and spread to land outwith the installation boundary. The housing units are then washed down and disinfected before the introduction of the next flock. Washwater will be collected in a sealed below ground tank prior to being spread to land outwith the installation boundary.

No food mixing occurs within the installation boundary. The premixed feed is delivered directly to the site as required. Feed composition is adjusted throughout the flock cycle to provided optimal nutrient uptake and minimise loss via manure.

Water is supplied to the site via mains water supply. Nipple drinkers will be used to water the birds. These reduce wastage of water and maintain dry litter.

Lightly contaminated roof and surface water from the concrete pads around the site and scratch areas will drain to a series of swales for treatment. The swales have been designed in accordance with the CREW Rural SuDS Guide.

Eggs are conveyed to a central service area where they are packed for processing off site.

Bird mortalities will be collected daily and transferred to a freezer within the Central Services Area for removal by an appropriately licenced facility.

The free-range area will be planted with trees. When mature the tree canopy will aid in absorbing dust and ammonia emissions thereby reducing their impact on the surrounding environment.

Collectively, these measures are intended to reduce the production and release of ammonia, odours, and dust from the housing units, to prevent liquid washings escaping to the environment, and to manage the waste produced on-site. All aspects of building design and operation will be supported by management systems that aim to minimise the impact of the permitted activities on emissions to air, water, and land.

A Baseline Report has been submitted with the application and has been assessed as satisfactory to meet PPC Schedule 4 Part 1.

There are duties placed on SEPA for the protection of designated sites under The Conservation (Natural Habitats, &c.) Regulations 1994 and the Nature Conservation (Scotland) Act 2004. Easter Meathie Free Range Egg Farm lies within 10 kilometres of 10 designated sites (please see Section 4.4 of this Decision Document). The applicant submitted detailed modelling (Air Quality Impact Assessment (AQIA)) for the proposed free range layer unit, which was undertaken as part of the planning application. The AQIA was assessed by SEPA as acceptable with no predicted breaches of critical loads and levels at nearby designated sites.

The application submitted complies with both the PPC requirements and the Standard Farming Installation Rules.

Determination was therefore to issue the Permit PPC/A/5003791 based on the application submitted.

Glossary of terms

BAT	Best Available Techniques
BREF	Best Available Techniques Reference Document
CO	Coordinating Officer
CREW Rural SuDS Guide	CREW Rural Suds Design and Build Guide' means the Duffy, A. Moir, S. Berwick, N. Shabashow, J. D'Arcy, B. Wade R. (2016). Rural Sustainable Drainage Systems: A Practical Design and Build Guide for Scotland's Farmers and Landowners, CRW2015/2.2, available online at www.crew.ac.uk/publications
DAA	Directly Associated Activity
ELV	Emission Limit Value
GBR 18	General Binding Rule 18 of the Water Environment (Controlled Activities) (Scotland) Regulations 2011
IA	Intensive Agriculture
IED	Industrial Emissions Directive
NVZ	Nitrate Vulnerable Zone
PM ₁₀	Concentration of particles that are less than or equal to 10 µm in diameter
PPC	Pollution Prevention and Control (Scotland) Regulations 2012
PPD	Public Participation Directive
SAC	Special Area of Conservation
SCAIL	Simple Calculation of Atmospheric Impact Limits
SFIRs	Intensive Livestock Installations, Standard Farming Installation Rules (How to Comply): Incorporating PPC Permit application guidance. April 2013.

SGRPID	Scottish Government Rural Payments and Inspections Directorate
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System

2 EXTERNAL CONSULTATION AND SEPA'S RESPONSE

Is Public Consultation Required: Yes

Advertisements Check:	Date	Compliance with advertising requirements
Edinburgh Gazette	11/11/2022	Yes
Dundee Courier	11/11/2022	Yes

Officer checking advert: CO

No. of responses received: None

Summary of responses and how they were taken into account during the determination: No responses received.

Summary of responses withheld from the public register on request and how they were taken into account during the determination: N/A

Is PPC Statutory Consultation Required: Yes

Food Standards Agency:

Consulted: 08/11/2022

Reconsulted on 14/11/2022 due to an error in the initial consultation.

Response received: 22/11/2022

'Based on the application and provided that the applicant complies with the relevant SEPA Guidance and all other relevant PPC Guidance Notes and Regulations, Food Standards Scotland considers it unlikely that there will be any unacceptable effects on the human food chain from the emissions from this installation.'

Health Board:

Consulted: 08/11/2022

Reconsulted on 14/11/2022 due to an error in the initial consultation.

No response received.

Local Auth:

Consulted (Environmental Health): 08/11/2022

Reconsulted on 14/11/2022 due to an error in the initial consultation.

No response received.

Scottish Water: N/A

Health and Safety Executive: N/A

Scottish Natural Heritage (PPC Regs consultation):

Consulted (NatureScot): 08/11/2022. Response received: 09/11/2022

No comments to make.

Reconsulted on 14/11/2022 due to an error in the initial consultation.

Response received: 14/11/2022

No comments to make.

Discretionary Consultation – N/A

Enhanced SEPA public consultation – N/A

'Off-site' Consultation - N/A

Transboundary Consultation - N/A

Public Participation Consultation - Yes

STATEMENT ON THE PUBLIC PARTICIPATION PROCESS

The Pollution Prevention and Control (Public Participation) (Scotland) Regulations 2005 requires that SEPA's draft determination of this application be placed on SEPA's website and public register and be subject to 28 days' public consultation. The dates between which this consultation took place, the number of representations received and SEPA's response to these are outlined below.

Date SEPA notified applicant of draft determination	14/02/2023
Date draft determination placed on SEPA's Website	14/02/2023
Details of any other 'appropriate means' used to advertise the draft.	
Date public consultation on draft permit opened	14/02/2023
Date public consultation on draft permit consultation closed	
Number of representations received to the consultation	
Date final determination placed on the SEPA's Website	

Summary of responses and how they were taken into account during the determination:

Officer: CO

3 ADMINISTRATIVE DETERMINATIONS

Determination of the Schedule 1 activity

As detailed in the application and supporting documentation.

Determination of the stationary technical unit to be permitted:

As detailed in the application and supporting documentation.

Determination of directly associated activities:

As detailed in the application and supporting documentation.

Determination of 'site boundary'

As detailed in the application and supporting documentation.

Officer: CO

4 INTRODUCTION AND BACKGROUND

4.1 Historical Background to the activity

The application by Craignathro Eggs Limited is for a new free range egg production farm located on agricultural land northwest of Mains of Easter Meathie. The site is located 3.9km south of Forfar, Angus. The farm will house a total of 64,000 free range laying hens in two new poultry housing units on a multitier aviary system.

The Applicant was required to demonstrate that the poultry housing units were designed having regard to the following principles outlined in the BREF and the BAT Conclusions:

- reducing the ammonia-emitting surface;
- removing the manure frequently to an external store (e.g., with belt removal systems);
- quickly drying the manure;
- using surfaces which are smooth and easy to clean;
- lowering the indoor temperature and ventilation as much as animal welfare and/or production allow.

The proposals for the new housing demonstrate that the chosen design addresses the above principles.

4.2 Description of activity

The activity proposed is rearing poultry intensively in an installation with more than 40,000 places as described in Part A of Section 6.9 (a) of Schedule 1 of the Regulations.

Craignathro Eggs Limited proposes two poultry housing units with a capacity for 64,000 places for free range hens for egg production.

Directly Associated Activities include:

- Feed delivery & storage
- · Generator & fuel storage

- · Water storage
- · Chemical storage
- Manure handling
- · Dirty water storage
- Storage of fallen stock for disposal
- · Management of lightly contaminated surface water
- · Auxiliary power generation.

4.3 Guidance/directions issued to SEPA by the Scottish Ministers under Reg.60 or 61.

None

4.4 Identification of important and sensitive receptors

Easter Meathie Free Range Egg Farm is within 10 kilometres of the following NatureScot designated sites.

Table 4.1: Designated sites within 10 kilometres of Easter Meathie Farm Range Farm

Name	Distance from Easter Meathie	Designation
River Tay	2.3	SAC
Restenneth Moss	5.1	SSSI
Carrot Hill Meadow	5.9	SSSI
Turin Hill	6.1	SSSI
Dilty Moss	6.2	SSSI
Rescobie & Belgavies Lochs	6.2	SSSI
River South Esk	6.8	SAC
Whitehouse Den	7.9	SSSI
Forest Muir	8.8	SSSI
Gagie Marsh	9.6	SSSI

Refer to Sections 5.2 and 6 for an assessment of the impact of the proposal on the identified designated sites.

The site is located in a rural area with outspread residences and other nearby agricultural operations. There are no human health sensitive receptors identified within 250 metres as part of the required screening for PM₁₀ emissions from this site.

5 KEY ENVIRONMENTAL ISSUES

5.1 Summary of significant environmental impacts

SEPA have identified several environmental impacts (not necessarily significant) which need to be assessed. These are identified as follows:

Emissions to Air Ammonia, dust (PM₁₀) and odour

Emissions to Land Waste, faecal material, and nutrient inputs to land

Emissions to Water Surface water discharge to surface water and indirect to groundwater

Other Emissions Noise

Associated risks Fuel and chemical storage

SEPA aims to control these through the conditions contained in the permit and by the requirement on the operator to comply with BAT as indicated in the SFIR and the 2017 BAT Conclusions.

During the pre-application process SEPA liaised with the applicant's consultant and COGEO who undertook the Air Quality Impact Assessment (AQIA) for the proposed free range layer unit. The AQIA was assessed by SEPA as acceptable with no predicted breaches of critical loads and levels at nearby Designated Sites or statutory limits of PM_{10} (dust).

5.2 Implications of the Application on - Point Sources to Air

The main point source of emissions to air from Easter Meathie Free Range Egg Farm will be from the housing units, ventilation system and the generator in the form of ammonia, dust and fuel fumes.

Ammonia and dust will be minimised by carefully managing air exchange to control humidity levels within the sheds and maintaining the dry matter content of the litter at an optimal value of between 60-65%.

Ammonia (BAT 23 & 31)

Ammonia can be carried on the air and deposited in lochs and ponds causing eutrophication. It is assessed that the main point source of ammonia from the installation will be from the housing and ventilation. To quantify the amount of ammonia which will be emitted, SEPA use DEFRA-approved emission factors. The emission factors are specific to each housing system. Some housing systems are more efficient than others and will result in a lower emission factor. The proposed housing at Easter Meathie Free Range Egg Farm meets the description in BAT Conclusion 31 (b) (4) 'manure belts (in case of aviary).'

There are duties placed on SEPA for the protection of designated sites under The Conservation (Natural Habitats, &c.) Regulations 1994 and the Nature Conservation (Scotland) Act 2004. Easter Meathie Free Range Egg Farm lies within 10 kilometres of 10 designated sites (please see Section 4.4 of this Decision Document).

Using the emission factor for free range layers of 0.108 kg NH₃/bird place/year (ammonia produced by an average sized bird)¹ the ammonia released from the installation at Easter Meathie Free Range Egg Farm would be on average 6,912 kg/year (based on a population of 64,000 birds).

To assess the potential impact of ammonia from Intensive Agriculture Installations on designated sites, the applicant is required to undertake modelling. The applicant submitted detailed modelling (Air Quality Impact Assessment (AQIA)) for the proposed free range layer unit, which was undertaken as part of the planning application.

Present advice is that ranging areas should be modelled as an area source equivalent to the whole ranging area with an average emission rate across the whole range. At the time of pre-application advice being given, modelling of the range area explicitly was not proposed for this application and SEPA accepted the use of a combined emission factor (0.108 kg NH₃/bird place/year) modelled as a point source. Taking into consideration that the predicted process contributions presented in the AQIA results are a very low percentage of the critical load for each receptor, the risk of significant adverse effect to site integrity is low and therefore changing the parameters of the model to observe this new requirement is unlikely to change the outcome.

The AQIA was assessed by SEPA as acceptable with no predicted breaches of critical loads and levels at nearby designated sites. It was concluded that a significant effect is unlikely, and no further assessment was required.

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¹ SEPA's default position is that the estimated emission factor for time spent on the ranging area is 0.22 kg NH₃ per bird-place per year. Ranging emissions should be factored by 20% (Inventory of Ammonia Emissions from UK Agriculture 2020), to represent the proportion of emission arising from droppings on the range. Housing emissions (0.08 kg NH₃ per bird place per year for an aviary system) should be factored by 80%, to represent the proportion of emission derived from indoors.

During the determination of this permit, the Applicant notified SEPA of an amendment to the PPC application. Each poultry house will be fitted with a heat exchanger. This had not been included in the initial application. The heat exchanger warms the incoming air, which will be directed onto the manure belts, and result in drier conditions within the poultry house. Heat exchangers have been added to satisfy planning requirements for manure management by the local Council.

Heat exchangers attract a 60% reduction in the ammonia emission factor². As the heat exchangers were only included in the proposal after the AQIA had been concluded, the 60% reduction to the ammonia emission factor has not been applied. Therefore, the addition of heat exchangers will reduce ammonia emitted from the poultry houses and reduce impacts on the designated sites and surrounding environment ever further.

A tree planting plan for the site will be developed by the Woodland Trust. The main purpose of the tree planting is to augment the ranging area. Once mature, the trees will act as a shelter belt for ammonia emissions affording greater protection of the surrounding environment. The additional reduction that the trees will afford once mature was not factored into the air quality monitoring.

Dust (PM₁₀) (BAT 11)

Dust from poultry houses mainly originates from feathers, skin particles and used litter and to a lesser extent from feed and bedding.

PM₁₀ dust particles (particulate matter 10 micrometres of less in diameter) are subject to statutory air quality standards. In Scotland, air quality objectives are set out in the Air Quality (Scotland) Regulations 2000 (as amended).

Where sensitive receptors are located within 250 metres of a poultry unit, SEPA requests that the Applicant screens the emission of particulate matter to establish whether the emission will cause any air quality objectives to be breached. COGEO identified several human health receptors within 1 kilometre of the proposed site as part of the AQIA. The closest receptor to the proposed site is approximately 350 meters to the north. The AQIA concluded that the proposed development is not likely to exceed air quality objectives at sensitive receptors.

As there are no sensitive receptors located within 250 metres of the proposed poultry site, and the AQIA showed that there are no predicted exceedances of air quality objectives within 1 kilometre of the proposed site, SEPA has assessed the risk to human health as acceptable.

Diesel Generator

It is a requirement of the animal welfare regulations that the birds have adequate heating and ventilation at all times. The site will be powered by solar panels and supplemented by mains grid electricity. However, in the event of a power failure, a back-up diesel generator will be used. SEPA are aware that diesel generators can give rise to dense fume, especially at start up, or if the generator is poorly maintained, and would expect the operator to use BAT particularly with regard to servicing and maintenance to minimise visible emissions and particulates from the exhaust. The generator will be tested for a short period once per week.

5.3 Implications of the Application on - Point Source Emissions to Surface Water and Sewer

Foul Drainage

There are no public sewers within the vicinity of Easter Meathie Free Range Egg Farm and therefore there will be no discharges to the sewer.

A septic tank will be installed to collect all domestic wastewater from the welfare amenities and discharge to a full soakaway north of the poultry sheds. This is to be authorised under The Water

2

² Inventory of Ammonia Emissions from UK Agriculture 2020.

Environment (Controlled Activities) (Scotland) Regulations 2011. The foul effluent system is not considered part of the Permitted Installation.

Surface Water Drainage

Surface water run-off from the housing unit roofs, scratch areas and low-contamination yards will be directed to two swales (please see EM Drg 1 Drainage layout V11 and EM Drg 2 Design of Swales in the application supporting documentation).

As the swales are located on the range area and the lower range area is known to be closer to the winter water table level, the proposed depth of the swales is less that that recommended in the CREW Rural SuDS Guide. There is a need for the range area to remain as dry as possible to avoid attracting wild birds to standing water and therefore the applicant designed shallow swales with increased surface area. This ensures that that overall treatment volume is maintained, and evaporation and evapotranspiration achieved. The capacity calculations submitted for the swales have demonstrated adequate storage for this purpose.

Scratch areas will be underlined with an impermeable membrane to ensure that all scratch area drainage is captured and directed to the swales. Drainage will be conveyed to the swales via solid pipes. Two swales in parallel will be installed, operating on a first flush separator principle. The first swale will treat the 'first flush' containing most of the dust and nutrients, having a longer period of contact with the grass sward and provide better treatment. The first flush principle is acceptable provided the swales are well maintained. Much of the nutrient loading, particularly phosphorous, will be in the first swale and this may require a greater level of maintenance. A check dam will be provided in the second swale to retain flows for a short period following a storm event.

The south side of the housing units (free range area) will have an interceptor drain, cutting off drainage from higher ground and diverting it away from the poultry houses. The interceptor drain discharges to the Spittal Burn via a pumping station. This is authorised separately by The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (as amended), General Binding Rule 21.

The second swale will be provided with a high-level overflow to the interceptor drain via solid pipe. The high-level overflow will be fitted with a bund that can be closed off to prevent a discharge to the interceptor drain in the event of a pollution incident on site and create additional retention within the swale during an emergency.

The swales will be fenced off to restrict poultry access.

A sheet swale is to be installed to collect and treat run-off from the access road. The sheet swale has been included in the surface water drainage capacity calculations and will be directed to the parallel swale system via solid pipe.

The installation of a Sustainable Drainage System to treat surface and yard runoff via new swales adheres to the guidelines in the CREW Rural SuDS Guide, considered BAT for IA permitted installations.

5.4 Implications of the Application on - Point Source Emissions to Groundwater

There shall be no direct point source emissions to groundwater as a consequence of this application. The applicant has demonstrated that the swales are designed in line with SEPA advice and are sufficiently sized. If maintained properly, they will provide sufficient treatment of lightly contaminated run off and therefore this is not considered to be a point source discharge to groundwater.

SEPA has assessed as satisfactory the Site & Baseline Report submitted with the application subsequent to further clarifications. This report evaluates past potential contamination and future pollution risks to both soil and groundwater (please see Section 5.20 of this Decision Document).

5.5 Implications of the Application on - Fugitive Emissions to Air (BAT 1 & 11)

There are a few potential fugitive emissions to air. These include the release of dust and ammonia during cleaning or opening of the housing units for fallen stock removal, and from the birds themselves. SEPA accepts that some fugitive releases are unavoidable, for example, unplanned releases due to an unforeseen incident; others such as poor cleaning practices can be controlled through the relevant management techniques. SEPA views fugitive releases to air from these activities as an indication of process or maintenance issues and would require any defects to be reported and rectified as soon as possible.

Feed silos will be fitted with cyclone particle containment and mitigation to contain dust emissions as per the requirement in BAT 11.

Although not specifically covered by conditions within the permit, maintenance issues are covered by the PPC Regulations under Regulation 22 which requires the use of BAT. SEPA seeks to reduce these occurrences by requiring operators to record maintenance issues and demonstrate a high degree of environmental management over the activities they undertake. SEPA has a number of regulatory instruments it can use to gain compliance should the operator fail to comply.

SEPA does not have any specific policies in relation to bioaerosols from IA processes. There are currently no health criteria values available for interpreting the results of bioaerosol monitoring. Routine monitoring would be required at receptors within 250 metres should appropriate criteria for assessment be identified.

5.6 Implications of the Application on - Fugitive Emissions to Water (BAT 1 & 6)

There are several potential sources which could lead to fugitive emissions to water. These include, poorly maintained surfaces and drainage systems, bird delivery and collection, and lack of care during cleaning of the housing units, all of which can lead to contamination of surface waters.

SEPA views fugitive releases as avoidable and can usually link these incidents to either operational error or negligence. SEPA seeks to reduce these occurrences by requiring the permit holder to implement BAT and to provide training to relevant staff in environmental issues, exercising a high degree of environmental management, and continual maintenance of the activities they undertake.

The applicant is installing SuDS which has been designed to be fit-for-purpose and meets BAT.

5.7 Implications of the Application on – Emissions to Land (BAT 7 & 20)

In the case of free-ranging hens, SGRPID considers that deposition on a range will be constant across the whole area. In order to ensure that an installation is BAT and that an Operator is taking all appropriate preventative measures against pollution in a NVZ, the applicant is required to demonstrate that deposition on the ranging area is in accordance with the limit advised by SGRPID as 170 kg N/Ha under the Action Programme for Nitrate Vulnerable Zones (Scotland) Regulations 2008.

The entire ranging area will be included in the installation boundary. The application initially indicated a range area of 32 hectares but after deducting the footprint of buildings, for 64,000 birds to meet the limit of 170 kg N/Ha the applicant was required to increase the range area to at least 40 hectares.

The manure collected from the housing at least twice a week on manure belts will be spread to land as organic fertiliser outwith the installation boundary. Washwater is collected in below ground tanks prior to being spread on land outwith the installation boundary. The spreading to land of manure and washwater outwith the installation boundary is covered by the Water Environment (Controlled Activities) (Scotland) Regulations 2011, General Binding Rule 18 (GBR 18).

A disinfectant wheel-spray applied via knapsack to vehicles entering the site will be available at the farm gate. The nature of the application means that little to no disinfectant is absorbed into the unmade ground on the access road.

5.8 Implications of the Application on – Odour (BAT 1, 12 & 13)

SEPA has identified potential odour issues from this intensive poultry farm. These include ammonia and odours from chlorinated cleaning materials or disinfectants to clean the housing units.

SEPA acknowledges that odour from intensive agriculture installations can give rise to complaints and requires operators to undertake odour assessments, and to formulate and implement an Odour Management Plan to reduce the impact on the local environment.

BAT 1 requires the permit holder to produce an Odour Management Plan having regard to BAT 12 detailing odour techniques and reduction of odour emissions in accordance with BAT 13. The permit will require that offensive odours not be emitted beyond the site boundary.

5.9 Implications of the Application on – Management (BAT 1 & 2)

Good site management is a requirement not only of the PPC Regulations & BREF but also the Food Safety Act 1990, regulated by the Food Standards Agency, and the Animal Welfare Act 2006. Agricultural installations are subject to regulatory controls requiring Operators to operate installations to a high standard both to ensure welfare of animals and to protect products entering the food chain.

BAT 1 requires that the permitted activity is operated in accordance with an environmental management system (EMS). The BREF requires that in order to improve the overall environmental performance, the EMS should incorporate the following key features:

- Management commitment
- Environmental policy
- Financial planning and investment
- Relevant procedures (training, record keeping, maintenance, emergency procedures)
- Checking performance (monitoring, preventative action, auditing)
- Review
- Continual improvement
- Benchmarking
- Noise Management Plan
- Odour management Plan

BAT 2 requires good housekeeping to prevent or reduce the environmental impact and improve overall performance. This includes training, routine maintenance and an emergency plan.

The applicant has indicated that the installation will be operated in full compliance with Section 2.1 of SFIRs requiring an appropriate person and deputy, a management system, competent staff, and record keeping.

5.10 Implications of the Application on - Raw Materials

Chemicals:

Chemicals used in poultry rearing include cleaning and disinfection chemicals, pesticides, rodenticides, herbicides, insecticides and fungicides. All of these chemicals are required to be DEFRA-approved. Chemicals will be delivered to Easter Meathie Free Range Egg Farm and either stored or brought onsite solely for cleaning and then removed. Once onsite chemicals will be kept in the chemical storage area in bunded containers within the Central Service Area of the poultry unit. Dosage into working solutions will take place in the secure Central Service Area (no drains). Procedures are in place to absorb any spillage and ensure appropriate disposal.

Veterinary Medicines:

Veterinary medicines are routinely brought onto the site as needed and stored in a secure, refrigerated store within the Central Services Area. Medicines will be dosed into working solutions in a secure area (no drains). Procedures are in place to absorb any spillage and ensure appropriate disposal.

Agricultural Fuel Oil:

Agricultural fuel oil (also known as red diesel) is stored within the bunded generator itself and there is no separate storage on site. The generator will be sited on a concrete plinth. The fuel storage is compliant with The Water Environment (Miscellaneous) (Scotland) Regulations 2017.

Other Fuel Oils:

Other fuels used for site machinery such as mowers and strimmer's will be stored in small quantities (5 litre containers) in a secure area. There is a filling protocol in place to ensure machinery is filled away from the site drainage system. Emergency absorbent material will be onsite in the event of an accidental spill. Most fuel will be brought onto the site as needed.

Water:

Water is sourced from the mains network and stored in overhead tanks in the Central Services Area. Water is used to supply drinking water to the birds and for washing down the housing units at depletion.

Feed (BAT 3 & 4):

Feed will be supplied to the site, pre-mixed, into 4 fully enclosed silos each fitted with cyclone particle containment and mitigation. Feed will then be transported into the feed chain systems within the units by augers. Any feed spillages will be cleared up immediately to prevent any potential contamination of ground water or watercourses and to deter pests. Rations are formulated by poultry nutritionists. Feed specifications are created to minimise the amount of nitrogen and phosphorous excreted by the birds over the flock cycle by optimising crude protein output and feed utilisation. SEPA is satisfied that this meets the requirements of SFIR and BAT.

Litter:

Up to 20 tonnes of wood chips will be used as bedding litter at the beginning of each flock cycle. Litter is brought onsite as required and no additional litter is stored onsite.

5.11 Implications of the Application on - Raw Materials Selection

All applicants applying for PPC Part A permits are required to examine their Raw Materials usage and seek ways to reduce their impact on the environment. The standard permit condition requiring the formal assessment of resource utilisation on site will require the operator to identify where any efficiencies can be made and demonstrate continuing improvement.

5.12 Implications of the Application on - Waste Minimisation Requirements

Standard permit conditions require the operator to minimise waste and where possible develop and implement recycling or recovery strategies. Records are required to be kept on site of all waste streams and the source, quantity and disposal routes taken. This data will be reviewed every 4 years in the resource efficiency report required in the permit.

It is not anticipated that there will be much waste generated by the site. Packaging such as plastic, paper and cardboard will be collected and stored in small bins in the yard outside the Central Service Area and sent for recycling as appropriate.

5.13 Implications of the Application on - Water Use (BAT 5)

Water use within the food production sector is primarily an animal welfare issue as the operator of the installation is required under other legislation to provide an adequate supply of clean water for both the welfare of the birds and to undertake adequate cleaning of vehicles. It is up to the operator to demonstrate the use of BAT to minimise water usage, but SEPA does directly regulate water use through permit conditions requiring the operator to minimise water consumption and explore options for minimisation, and to report consumption in the resource efficiency report.

The greatest volume of water consumed is drinking water for the birds. Fresh mains water will be delivered to poultry via nipple line drinkers with drip collection cups to prevent spillages (as outlined in the SFIR and BAT standards) thereby reducing wastage and ensuring dry litter.

Water is also used for cleaning the poultry units at the end of the cycle. The housing units are washed down and disinfected before the introduction of the next flock.

5.14 Implications of the Application on – Waste Handling, Waste Recovery or Disposal

An underground washwater storage tank will be used to collect contaminated water from the poultry housing cleaning process. The washwater will be spread to land outwith the permitted installation. The washwater tank must be inspected routinely to ensure its integrity.

Foot washes are located at various locations around the site and spent disinfectant is emptied into the underground washwater tank. Where a disinfectant or effluent from cleaning may contain list I or II substances, washwater must be exported from site and disposed of at a suitably licenced facility. When a disinfectant does not contain list I or II substances, washwater can be spread to land in accordance with GBR 18.

Mortalities will be removed daily to a secure, vermin proof freezer in the Central Services Area. Final removal will be by registered contractors under the fallen stock scheme. All disposal of carcasses will be undertaken in accordance with the Animal By-Products (Enforcement)(Scotland) Regulations 2013.

Manure will be removed from the poultry housing units via manure belts into trailers 2-3 times per week and spread to land outwith the permitted installation.

The volume of other wastes stored on the site is minimal and all will be considered in the relevant section of the resource efficiency assessment required under the standard permit condition. The onus of Duty of Care shall apply to all waste management at the installation.

5.15 Implications of the Application on – Energy (BAT 8)

A computer-controlled system maintains the temperature within the housing units. This is directly linked to the ventilation system to prevent over-heating and lack of free ventilation. SEPA recognises that energy usage is dependent on several factors outwith the control of the operator who has to maintain the welfare of the birds in extremes of weather.

A permit condition requiring the formal systematic assessment of energy consumption on site will require the operator to identify where efficiencies can be made.

The site will be powered by solar panels and supplemented by mains grid electricity. A standby diesel generator will supply back-up power in the event of a mains outage.

5.16 Implications of the Application for - Accidents and their Consequences (BAT 1)

The PPC Regulations specifically preclude SEPA from adding conditions to a Permit regarding the Health and Safety of Staff or workers on-site; however should an accident or incident occur that is likely to pose a risk to the environment or harm to human health in the wider community then SEPA would require, under the conditions of the permit, that not only must the Operator take action to limit the immediate

environmental impact but where necessary implement changes to try to ensure that the event does not happen again.

In general, all accidents or incidents likely to cause pollution and all complaints to the site regarding nuisance emissions are required by Schedule 7 of the Permit to be recorded and dependent on the severity, notified to SEPA. Emergency preparedness and response (incident prevention and mitigation) are required as per BAT 1 as part of the Environmental Management System for the site.

5.17 Implications of the Application for – Noise (BAT 9 & 10)

Noise at the permitted installation is covered by Section 2.9 of the SFIR which is considered by SEPA to meet BAT Conclusions 9 & 10 which the operator is required to have regard to when operating an intensive agriculture site under the PPC Regulations.

The Permit and SFIR recognise that noise can give rise to complaints. The operator is required to undertake noise assessments and produce a Noise Management Plan to prevent or minimise the impact on the local environment.

The predominant source of noise from poultry housing units is generated from the ventilation systems. Other sources of noise related to this type of activity can include vehicle movements in and around the site and the placement and removal of the birds. The latter two are considered unlikely to cause issues as these activities will take place for such short durations as well as being infrequent. Routine maintenance of fans will also prevent noise and the noise management plan will address any issues that should arise and will be updated as stipulated in the permit.

5.18 Implications of the Application for – Monitoring (BAT 24, 25, 26, 27 & 29)

SEPA places a lot of emphasis on self-monitoring and record-keeping as keys to the successful running of a PPC installation. The operator is required within the permit to undertake odour and noise assessments. General monitoring of the site is also covered in the Permit to assess operational conditions and environmental performance.

Various permit conditions require the operator to monitor the level of inputs and the volume of outputs and to consider how changes made benefit the environment. The 2017 BREF introduces the following additional monitoring requirements:

- 1. The total nitrogen and total phosphorus excreted in manure
- 2. Ammonia emission to air
- 3. Dust emissions
- 4. Process parameters

The European Commission during deliberations around the revised BREF, accepted the proposal from the UK technical Working Group to estimate emissions by using DEFRA approved emission factors to comply with the monitoring requirements for 1-3 identified above.

Process parameters include water consumption, energy consumption, fuel consumption, incoming and outgoing bird numbers, feed consumption and manure generation. This is already well documented and will be formally required via the resource utilisation permit condition.

5.19 Implications of the Application for – Closure

Standard conditions in the permit will be appropriate for this installation including the production of a Decommissioning Plan. The operator has agreed to meet Section 2.15 of the SFIR for Decommissioning.

In order to ensure that the site can be returned to its pre-PPC Permit state, SEPA have required the applicant detail any pre-application problems prior to permitting so that a site surrender report can be compared with the Site Condition and Baseline Reports. Surrender of the permit is by an application to

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SEPA who have to be satisfied that the requirements of Regulation 19 of the PPC Scotland Regulations 2012 (as amended) are complied with.

As per the PPC Regulations the Applicant shall need to remediate the site where required to the levels cited in the baseline report (please see Section 5.20 below for more information).

5.20 Implications of the Application for - Site Condition Report (and where relevant the baseline report)

As per Regulation 48 of the PPC Regulations a Site Report and a Baseline Report was submitted with the application. SEPA has assessed both reports as satisfactory. These reports evaluate past potential contamination and future pollution risks to both soil and groundwater.

A single round of surface water sampling was undertaken at three monitoring points on the Spittal Burn. The locations of the monitoring points and the analytical suite are acceptable. Nitrate levels were moderately elevated but below the potable limit. As the site is in an NVZ elevated Nitrate levels would be expected.

There is a CAR authorisation for an abstraction from Spittal Burn approximately 175m downstream of the pumping station discharge from the PPC site (CAR/L/1004707 Kincreich Farm, u/s Abs from Spittal Burn @ Moss Lands of Meathie). The operator's site management systems should include contingency plans for appropriate action in the event of a pollution incident, including notifying downstream abstractors in a timely manner.

Due to the location of the site within an NVZ and the nearby downstream abstraction, water quality monitoring will be set annually in the permit. Soil sampling and analyses will be standard (every 10 years).

5.21 Implications of the Application for - Consideration of BAT

SEPA published its view of indicative BAT relating to intensive agriculture operation in its Standard Farming Rules (SFIRs). SFIRs are based on the BAT Reference Document (BREF) for Intensive Agriculture Installations published by the European IPPC Bureau in 2017. The SFIRs have been used throughout this permit variation to benchmark faming activities. The application indicates that the installation will be operated in accordance with Best Available Techniques (BAT).

6 OTHER LEGISLATION CONSIDERED

Nature Conservation (Scotland) Act 2004 & Conservation (Natural Habitats &c.) Regulations 1994

Is there any possibility that the proposal will have any impact on sites designated under the above legislation? No

Justification: Refer to Section 5.2 above.

Screening distance(s) used: 10 kilometres as per the SEPA Nature Conservation Procedure Guidance (NCP-P-01).

Other legislation

Action Programme for Nitrate Vulnerable Zones (Scotland) Regulations 2008:

The applicant demonstrated that the size of the ranging area is sufficient that deposition is in accordance with the limit of 170 kg N/hectare. See Section 5.7.

The Water Environment (Controlled Activities) (Scotland) Regulations 2011 (CAR) and Nitrates Directive:

This primarily applies to land-spreading activities that will be taking place outwith the installation boundary. These will need to comply with GBR 18. See Section 5.7.

Foul drainage systems such as a septic tank to soakaway will be regulated separately under CAR and this will not form part of the permitted installation.

The swale system to treat surface water drainage has potential to impact groundwater and therefore SuDS design must be in accordance with CREW Rural SuDS Guide. See Section 5.3.

The Water Environment (Miscellaneous) (Scotland) Regulations 2017:

The requirements for the generator oil storage under these Regulations are met. See Section 5.10. consideration of oil storage as BAT. There are no conflicts with ongoing CAR regulation of this process.

Animal By-Products (Enforcement)(Scotland) Regulations 2013:

Regulates carcass disposal. Carcass storage is a is a Directly Associated Activity (DAA) in the permit. See Section 5.14

Medium Combustion Plant Directive (MCPD):

For all proposed plant >1MW regulated as DAA on IA installations, BAT will apply and SEPA should complete Local Air Quality Management and Nature Conservation Habitat screening. If required, SEPA will impose monitoring of emissions within 4 months and then every 3 years with ELVs from Process Guidance Note 1/3 or the MCPD. There is no plant >1MW on site at the time of permit issue.

Officer: CO

7 ENVIRONMENTAL IMPACT ASSESSMENT AND COMAH

How has any relevant information obtained or conclusion arrived at pursuant to Articles 5, 6 and 7 of Council Directive 85/337/EEC on the assessment of the effects certain public and private projects on the environment been taken into account? N/A

How has any information contained within a safety report within the meaning of Regulation 7 (safety report) of the Control of Major Accident Hazards Regulations 1999 been taken into account? N/A

Officer: CO

8 DETAILS OF PERMIT

Do you propose placing any non standard conditions in the Permit? No

Do you propose making changes to existing text, tables or diagrams within the permit? N/A as new permit application.

9 EMISSION LIMIT VALUES OR EQUIVALENT TECHNICAL PARAMETERS/ MEASURES

Are you are dealing with either a permit application, or a permit variation which would involve a review of existing ELVs or equivalent technical parameters? No

Emission limit values - Air

Substance: Ammonia

Relevant emission benchmarks: BAT AEL's

ELV: 0.02-0.13 kg NH₃/animal place/year

Emission point: Poultry housing and ranging areas.

Rationale: BAT Associated Emission Limits (AELs) are a requirement introduced in the BREF. As part of the BREF review and 2017 publication of the BREF it was accepted by the Commission that operators could use emission factors to demonstrate compliance with the BAT AELs for ammonia. The emission factor used for a free-range aviary system is 0.108 kg NH₃/animal place/year, which is comfortably within the required range. The operator will be required to confirm on an annual basis that the DEFRA-emission factor still applies and that no changes have been made.

Substance: Total Nitrogen Excreted

Relevant emission benchmarks: BAT AEL's

ELV: 0.4-0.8 kg/animal place/year

Emission point: Manure collection belts

Rationale: BAT AELs are a requirement introduced in the BREF. There are presently no approved emission factors, but it is expected that compliance will be demonstrated via mass balance using feed information and standard manure analysis.

Substance: Total Phosphorus Excreted

Relevant emission benchmarks: BAT AEL's

ELV: 0.10-0.45 kg/animal place/year

Emission point: Manure collection belts.

Rationale: BAT AELs are a requirement introduced in the BREF. There are presently no approved emission factors, but it is expected that compliance will be demonstrated via mass balance using feed information and standard manure analysis.

10 PEER REVIEW

Has the determination and draft permit been Peer Reviewed? Yes

Name of Peer Reviewer and comments made:

- Add in function of heat exchanger.
- Add comment on detailed modelling undertaken as part of planning application.
- Remove reference to Ringleman shade 1 and no visible smoke from the generator requirement.
- Add in BAT 11 cyclones on feed silos.

11 FINAL DETERMINATION

Issue a Permit – Based on the information available at the time of the determination SEPA is satisfied that:

- The applicant will be the person who will have control over the operation of the installation,
- The applicant will ensure that the installation is operated so as to comply with the conditions of the Permit,
- That the operator is in a position to use all appropriate preventative measures against pollution, in particular through the application of best available techniques,
- That no significant pollution should be caused.

Officer: CO

12 REFERENCES AND GUIDANCE

Standard Farming Installation Rules (SEPA's general sector Guidance)

Nature Conservation Procedure NCP-P-01

The assessment of potential impacts on designated sites of atmospheric emissions of ammonia from PPC intensive agriculture installations NCP-P-02

Sniffer ER26: Final Report on the update of the Simple Calculation of Atmospheric Impact Limits (SCAIL) (2014)

BAT Reference Document (BREF) BAT Conclusions for the Intensive Rearing of Poultry or Pigs (2017) Rural Sustainable Drainage Systems – A practical design and build guide for Scotland's farmers and landowners (2016)

SEPA Guidance on Consultation under PPC (IED-PG-01-04)

White Cottage, Easter Meathie Farm, Forfar DD8 2LF

27 November 2023

The Planning Department, Angus Council, Angus House, Orchardbank Business Park, Forfar DD8 1AN

Dear Sirs,

Reference: 21/00602/FULM

Application of Craignathro Eggs Ltd. at Easter Meathie Farm for the erection of two 32,000 capacity free-range hen sheds and associated infrastructure including feed silos, egg packaging facility, vehicular access, access tracks, drainage and landscaping.

Market requirement for Free-Range eggs and statistics on egg production and markets

In reviewing the report to the Development Standards Committee on the planning application for similar sized hen sheds at North Mains of Cononsyth [report no 27/23, 14 February 2023] and listening to the Committee's deliberations, I was surprised to see unsubstantiated statements made in the Council report regarding the current egg market and its viability and comments from Councillors which did not really clarify the actual situation regarding egg production in the UK.

I am concerned that unsubstantiated and untested statements will find their way into any report on the Easter Meathie application and would like to provide some actual statistics and forecasts from the egg industry, rather than mere conjecture.

In the Planning Department's report it is stated:

- **at para 8.8** ... 'The supporting information indicates that there is a need for additional free- range poultry buildings to meet the forecast increased demand for free-range eggs, driven by the move away from caged facilities'.
- **at para 8.43** 'Balanced against that, the development would provide a source of eggs which would increase food security and may reduce carbon emissions associated with food miles'.
- **at para 8.47** 'However, the submitted information indicates that there is a need for additional free-range egg production because of a move away from caged egg production'.
- at para 8.52 'The economic benefits associated with the proposal are not clearly detailed or quantified in the information submitted with the application. However, it is reasonable to conclude that the diversification would aid the viability of the existing business which makes a positive contribution to the local economy'.

None of these statements were substantiated in any way and a brief review of the available information would have established that it is **not** reasonable to conclude that the free-range production is increasing or that it is driven by the potential and still very uncertain possibility of a reduction in caged birds.

An egg is basically an egg and the only real differentiation in the market place, and hence the price, is based on how the hens are housed.

In the UK, there are 4 classifications used in Government and industry statistics -

Caged [or more properly 'enriched' colony cages] - in cages

Barn -where hens are able to move freely around the house, with specified stocking densities

Free-range - where hens must have continuous daytime access to runs which are mainly covered with vegetation and a maximum stocking density of 2,500 birds per hectare

Organic - a very small part of the market

In 2021 and 2022, according to government statistics, **egg production**, split by type, was [all figures are millions of dozen] - **869 mil dozen = 10,428,000 eggs**

	2021	2022	% change	Production split 2022
Enriched colony cages	255	334	-24%	29%
Barn	17	60	+254%	7%
Free Range	556	520	- 7%	60%
Organic	36	34	- 5%	4%
Total	943	869	- 8%	
UK self sufficiency	95%	91%		

source - https://www.gov.uk/government/statistics/egg-statistics

Of course, the figures are affected by avian flu, but they do show the size of the market.

The next important point is to establish where these eggs go, as this will determine the demand for each type.

UK egg market breakdown for 2022 (industry estimate)

Retail (shell eggs) 66% Egg Products (eggs for food manuf/foodservice) 19% Foodservice (shell eggs) 18%

[Multiples, discounters and Co-op account for 90% of the retail market] source - https://www.egginfo.co.uk/egg-facts-and-figures/industry-information/data

It would appear that the bulk of free-range go into the retail sector, which is dominated by supermarkets and discounters, who rigidly control prices, whilst the bulk of caged and barn eggs go into the food manufacturing sector.

Accordingly, as the industry moves from caged [more about which is given below], it will move <u>within</u> the manufacturing sector, being replaced by barn eggs, with little impact on the free-range retail market.

The caged sector has a significant investment in buildings and land and, more importantly, the market contacts and the means of distribution. They are not going to give all this up and walk away from the market place. They will upgrade, when required.

It is also probable that any imports will go into this sector rather than the retail, free-range sector.

On 6 September 2023, the **British Free Range Egg Producers Association** [BFREPA] produced a paper on the potential implications of the 2025 cage 'ban', where it states firstly that the ban is **not** a ban or a legal regulation (see below) and then moves on to report on forecasts within the industry, stating -

'Mark Williams, then Chief Executive of the BEIC, forecast at last year's Pig and Poultry Fair that the national flock would rise to 38 million comprising a <u>smaller enriched colony flock size of 2.28 million</u>, a boosted 5.32 million in barn, **static 28.5 million in free range** and some 2 million in organic systems',

and noting that recently revised industry figures do show a national population of 38 million layers.

It then goes on to state - 'The new forecasts predict that the national flock size by **January 2025** will be 40 million with 4.4 million birds still in enriched colony cages, the barn flock size will double to 5.5 million, and the **free range flock size will remain static** at 28 million, and organic still projected at 2 million'.

Forecasts are just that, but if one of the industry's main bodies is making such statements, it must be treated with respect and at least referred to in any report on the industry.

The paper also tries to clarify the situation with **caged birds**.

As noted above, it states that the ban is **not** a ban or a legal regulation. The UK banned battery cages for hens in 2012, but the ban did not extend to **enriched** cages.

It further states that 'the consumer understands the welfare benefits of free range but does not understand the complexities of different egg production systems and will be surprised to learn that <u>colony-caged egg production continues perfectly legitimately</u> throughout 2025 and beyond'.

It states that the commitment by the supermarkets etc is due to cage bans in the USA, leading to a non-legislative knock on in Europe.

As such, the UK retailers' cage-free commitment is self-imposed, entirely voluntary, and open to interpretation. Will the ban start on 1st January 2025, 31st December 2025, or another date? Will it only refer to private label (supermarket branded) cartons or branded lines as well? Are ingredient eggs incorporated in manufactured foods or prepared meals exempt?

No one seems to know and it seems that it is predicted that enriched colony cages will exist for some time to come, as price will be a significant factor in their continued existence, particularly in the manufacturing sector.

In any event, there does not appear to be an overwhelming rush to expand the free-range sector.

As the paper states - 'Barn egg expansion makes the most sense; there is certainly a demand for it. The flock size has already doubled with early colony conversions, and with 8 million still in cages, it could double again'.

[https://www.bfrepa.co.uk/news/2025-cage-ban-looms-with-many-uncertainties/152]

Of course, there are other factors affecting the movement in free-range eggs, one of the principal ones being the **cost of investment**.

In an article in **Poultry World in February 2023**, in the section headed *'Planning applications fall'*, it reported -

It is becoming evident that the myriad of issues facing the sector are leading to a drastic decline in the number of planning applications. Ian Pick, the owner of the specialist agricultural and rural planning consultancy Ian Pick Associates, said he had seen the lowest number of applications for free-range egg housing than in 17 years of being in the business.

"From what we might call its peak in 2010 when we were getting up to 50 applications at any one time, by contrast, we currently only have 2 live applications going through and 1 enquiry."

Pick said the reason for the decline was down to poor margins: "Simply put, as we all know, supermarkets are paying less than the cost of production. We have seen many farmers get their fingers burned."

But the doubling of the cost of building was also putting off potential producers, he added: "Brexit, the war in Ukraine and inflation have led to phenomenal increases. Hefty increases in the cost of steel, wood, equipment and concrete have huge impacts on build costs. A year ago, the cost to build a 32,000-bird poultry shed would be around £1.2 million. Today that cost is more like £1.8 million. The other factor is the cost of borrowing. Rates have gone from around 2% to 5% and the margins are not there." https://www.poultryworld.net/poultry/layers/shortage-of-eggs-set-to-continue-in-the-uk/

Other industry commentators also stated -

'Ian (Pick) explained that one client planned to build a 32k shed in East Yorkshire, setting them back around £2.2 million'.

This application is for 64,000 birds, potentially £4.4 million, if built now.

Government statistics are only available for the first two quarters of 2023 and are distorted by avian flu and lockdowns. The figures [million dozen] are -

		Cage	Barn	Free	Organic	Total
2021	Q1+2	131	37	265	18	451
2022	Q1+2	92	78	221	16	406
	Change	-39	41	-44	-2	-45
	% change	-30%	111%	-17%	-11%	-10%

Given that the bulk of free-range will go to supermarkets, one should be aware of the supermarkets' policy of encouraging farmers to invest in egg production so that there is effectively an over capacity in the industry. This allows the supermarkets to rapidly switch production from any sheds that become infected and to 'encourage' competition between suppliers to keep prices down. There is always someone with poor margins, desperate to keep their facility running, who will undercut someone else. It has happened for years in all sectors of the food industry and will continue to do so.

There is talk of developing vaccines and disease resistant birds, but the virus is agile and different strains will develop rapidly in the confined, densely populated sheds and

it is unlikely that governments or the public would easily welcome vaccinations or gene modification.

From the above, I feel that it is clear that it cannot blandly be assumed that there is a huge demand for free-range eggs. For whatever reason, and there are many, there has been a fall off in free-range production, farmers have gone out of business and hen sheds have been left empty.

Any statement on the future of the industry and its viability should be rigorously challenged.

It would be a brave person who would move into this market.

From my own recent observation, the applicant's own hen shed at Craignathro is in 'lockdown', effectively making their eggs barn eggs rather than free range.

I would also challenge the assumption that this application will benefit the local economy.

The building design and equipment is provided by a German-based company, the construction will probably be by outside specialist contractors, all eggs will go south to retail and other distributors as any local supply will be already met by the existing facility at Craignathro. Bird feed is based on a strictly controlled, complex specification, including imported soya, to maximise egg production, and is supplied ready-mixed in bulk, so I struggle with the notion that the applicant will be able to use his own harvest to directly feed the birds.

The sheds would probably need to employ two additional staff, as duties can be shared with the applicant's existing operation.

I also see little scope for a reduction in carbon emissions associated with food miles as feed and other essentials will have to be delivered in bulk and eggs will be transported to packing/distribution depots for onward transportation to retailers etc. If they are not collected by lorries already coming down from established egg farms in the north, which are probably at full capacity, they will require separate runs, generating extra food miles.

In conclusion, Council officers should not simply accept assertions made by applicants, but should challenge them and compel applicants to justify their statements on the planning portal, so that they can be assessed and commented on by the public and independent experts.

Yours faithfully,		
Douglas Watt		
Submitted by email		