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**Attention: David Wetherill**

**F/2015/0767 – Anaerobic Digester Bio-gas Plant, Hill Farm, Jouldings Lane, Farley Hill**

Application F/2015/0767 - Anaerobic Digester Bio-gas Plant - Hill Farm, Jouldings Lane, Farley Hill

Swallowfield Parish Council recognises the need to promote green energy initiatives but in this case the adverse impact and harm outweigh the benefits by far. The Parish Council **strongly opposes** this application on the grounds that this is simply not the right place to locate such a large industrial scale facility and operation.

There has been a total lack of community engagement for an application that has been greeted with great public concern by those that have become aware of it. This lack of engagement is quite extraordinary given the unusual nature of the application and the huge impact that it would have not only for its immediate neighbours but also over an extensive geographic area through traffic generation, land use and its prominence in the landscape. Neighbourhood consultation should have been over a much larger area, not just the immediate neighbours. A number of residents have approached the Parish Council asking why they hadn't been officially consulted. This situation is in stark contrast to the solar farm proposals at Sheepbridge Court Farm. Such engagement would have been an opportunity for the applicants to put their case by explaining the proposals, technology and any benefits that could come from it. This can only lead one to conclude that the applicants have something to hide and are fearful that they do not have the answers to respond to public concerns.

**Planning Issues**

The key areas of concern relate to the following:

- a) The impact of an industrial scale facility and operation in a sensitive location
- b) Significant adverse impact on highways and traffic
- c) Harm to landscape character
- d) Loss of amenity for residents
- e) Environmental risks including proximity of the Primary School and pollution of water courses
- f) Questionable sustainability and green credentials
- g) Status as a Waste Management Facility.

### Industrial Scale of Facility and Operation

The application refers to the site as brown-field. This is not true, it is countryside.

This proposal is for a large scale facility and operation that relies on the importation of over 23,000 tonnes of material per annum to feed the digesters that operate on a 24/7/365 basis. At the other end of the process, the digestate storage lagoon is the size of an Olympic swimming pool and capable of storing 6 months output of digestate so digestate amounting to twice the capacity of the lagoon will need to be shipped off site each year in the summer months. Such a large scale operation is impossible to conceal and will generate huge volumes of traffic. It is completely inappropriate in such a sensitive location due to landscape importance, prominence on a hillside, proximity to houses and the primary school, and poor access along narrow lanes. Other forms of green energy production such as solar farms are in contrast essentially benign and generate no goods traffic, odours, noise, etc.

### Significant Adverse Highways and Traffic Impact

The Transport Assessment is woefully inadequate. It does not address:

- a) the impact on local roads;
- b) changes in the type of vehicles used compared to the existing uses;
- c) how the farm and goods traffic will be managed to minimise trips – the feedstock being imported is solid but the digestate being exported is liquid;
- d) how the farm and goods traffic will be managed to avoid deadly embraces where vehicles serving the facility meet others travelling in opposing directions on narrow sections of lane;
- e) vehicle operating hours and quiet times to safeguard local amenity, avoid busy periods such as school drop off and pick up, etc.;
- f) restrictions on routes used to avoid the school and narrow lanes.

There is no evidence base to support the assertions about existing traffic volumes or future reductions as the hay business is wound down.

The numbers in the document refer to two-way trips so each trip constitutes two separate movements, an inward journey and an outward journey. Hence the document gives a false and more favourable impression of the impact than is actually the case; the numbers of movements would be double what has been stated.

The vehicles used would on the whole be much larger than those used in the existing uses. The transportation of some 23,000 tonnes of harvested crops per annum would necessitate the use of extremely large bulk carriers in order to realise the efficiencies of scale and minimise the number of vehicle movements. Otherwise it would involve a large number of tractor-trailer journeys since this method could only transport some 10-12 tonnes at a time. That equates to some 4,000 individual traffic movements over the summer months just for the feedstock alone. The existing operation has a more even distribution of journeys, many of which are using relatively innocuous small vehicles such as pickup trucks and vans. The new operation would involve predominantly large bulk carrier HGVs, tankers and tractor-trailer combinations.

The proposal asserts that vehicles delivering to site would be loaded up with material leaving the site to reduce the number of journeys. However, the material being brought in is bulky and solid whereas most of the output will be in liquid form and so would require incompatible types of transport.

Residents challenge the number of existing vehicle movements claimed, suggesting that the figure is substantially lower. There is no testable evidence to support the assertions being

made by the applicants. In addition, it should be noted that the current use of some units for long term storage does not generate much traffic.

Whilst the applicants assert that the numbers of two-way vehicle trips may only increase by a small amount on average (from a monthly average for a year of 230 to 247), the seasonal variation is far greater, particularly during the summer months (from between 175 and 200 to between 250 and almost 300). This equates to some 600 mainly large vehicle movements passing by each month throughout the summer. This would be concentrated onto the one proposed route from the A327. This is at a time when residents would be spending more time outdoors where there will be a significant impact on their peaceful enjoyment. Furthermore, the vehicles would on the whole be larger and noisier than is presently the case. The narrow local lanes of Farley Hill are not suited to these larger vehicles.

The Council is not convinced by the analysis that the number of vehicle movements would only increase by a small amount compared with historic levels. Achieving this relies on a reduction in historic traffic, an increase in the size of vehicles used and sharing loads so that vehicles delivering goods also transport goods away from the site. This would all be reliant on effective management and control of these activities.

The site is in close proximity to the local Primary School and this is a cause of serious traffic problems at drop off and pick up times with cars often becoming gridlocked in a deadly embrace. The effect of adding large farm vehicles and HGVs into the mix and the adverse implications on traffic flows and the safety of the young children at any time of the day are all too obvious.

Farley Hill will already face increased levels of traffic as a result of the Arborfield SDL so the highways implications need to be evaluated with this in mind.

It has been suggested that the larger vehicles would only use Church Road in the Arborfield direction and its junction with the A327 but there is no guarantee of this. This does not eliminate the problems however. Where the road goes up the hill approaching the junction with Jouldings Lane there is a narrowing pinch point. Large vehicles travelling in opposing directions would not be able to pass without mounting the pavement which is less than standard width. A facility of this sort requires direct access to the trunk road network.

The Parish Council has seen the unintended consequences of a similar scenario at another operation in the parish, on Trowes Lane, that imports farm produce (mainly herbs) for packaging and then exports it to market. The operation is extremely small by comparison yet the relatively modest increase in the number of large HGVs using unsuitable lanes has caused obstructions, damage to verges and property and is a danger to other road users. In that instance, WBC has acknowledged that the roads should not be taking this sort of traffic. The Parish Council contends that a similar situation, only far worse, would apply in this case.

It is difficult to see how so many issues could possibly be controlled through the use of planning conditions that are meaningful, measurable and enforceable.

#### Harm to Landscape Character

The proposed installation would be situated in a prominent hillside location and would be viewable from the Blackwater valley and a large area to the south. The Council is concerned about the impact such a large industrial type of installation would have on landscape character in an area where policy is to protect the view from intrusions of this sort. The scale is substantial; each of the three digester tanks is the size of a house and far less attractive yet neither houses nor a typical industrial use would be permitted in such a sensitive location in the countryside. It is not enough to say that these industrial structures would be seen against a backdrop of trees and painted to blend in, they would still be prominent features.

Areas surrounding Hill Farm are designated in the Core Strategy Proposals Map as Areas of Special Landscape Importance. WBC's Landscape Character Assessment (part 2 section 16) describes Farley Hill as a landscape of overall high quality. It also notes that it has such a special character that this transcends its moderate condition in some areas which is a consequence of farms, of which Hill Farm is an example, having turned to more industrial uses and the presence of incongruous features of one kind or another. The landscape strategy is to strengthen existing character by conserving views and improving those aspects that contribute to its moderate condition.

Clearly the introduction of such a large industrial installation on a prominent hillside which can be viewed from a wide area is the very antithesis of what policy requires. It seems as if the assessment report included with the application and photos from selected vantage points have deliberately played down the impact and suggested that it can somehow be disguised by painting and tree planting and thus screened from view.

#### Loss of Amenity to Residents

Residents, particularly those living near to the entrance at the top of Jouldings Lane, will be severely impacted by the increase in the number of larger vehicles using the local lanes and travelling in and out of the site. Farley Hill attracts many recreational uses such as horse-riders and walkers and the vehicles will cause problems for these users of the surrounding lanes and byways. The creation of the large entrance at the top of Jouldings Lane brings noisy HGVs and tractor traffic into close proximity of residents' homes, passing right by their front or rear gardens. It is also by the entrance to the Woodbury House Care Home with its elderly residents.

The operation of the plant with the movement of material around the site will inevitably result in an increase in noise levels compared with previous relatively benign levels of activity.

#### Environmental Risks

These types of facility are known to "explode" on occasions where the containment membrane ruptures. This is not a rare occurrence and one has done so twice in one year. These incidents cause an uncontrolled release of methane, hydrogen sulphide which is poisonous in larger concentrations, and other gases.

This poses a serious health risk to people nearby, specifically to the local Primary School which is only a few hundred metres away and also uses the woodland nearer to the site as an outdoor classroom. The health and safety risks from environmental factors and traffic to the pupils, teachers and parents cannot be over-stressed.

This facility would be located on a steep hillside that drains to the River Blackwater at the base of the hill. There is clearly scope for contamination of this water course in the event of an accident or spillage. The tracks used by the HGVs would need to be on a firm solid base to cope with regular use and so water run-off down the hill would be increased.

In addition, the facility would be situated next to important woodland habitat which would be adversely affected.

The Council questions whether the owners will have the necessary technical expertise to run the facility safely. There should be a commitment to hiring professional expertise to operate the facility.

#### Questionable Sustainability and Green Credentials

Installations of this type are generally favoured where the organic material and/or waste used by the digesters are produced on the farm holding and the digestate is used to fertilise

neighbouring fields. This obviates the need to transport materials on and off site; consequently such installations are comparatively small in scale.

The green credentials of this proposal are undermined by the need to import a vast proportion (around 95% - some 23,000 tonnes) of the material used from farms that are several miles distant using country lanes both in Farley Hill and farther afield that were never intended for such volumes of traffic. It is understood for example that farms on the Stratfield Saye estate may be involved in production. Furthermore, the output must also be exported from the site.

The farming community and others question whether it is right to be growing crops simply to be rotted down rather than to be used for animal feed or human consumption.

#### Status as a Waste Management Facility

The Environment Agency classifies this proposed installation as a Waste Management Facility. The on-line copy of the planning application form has an extra page which duplicates part of section 22 and section 23. One version is saying it is not a waste management facility which is clearly incorrect.

In today's market, the economics are such that with low prices for crops currently, growing material for the digesters is financially viable but this situation could easily change with more lucrative markets becoming available and then crops would then be grown for these other markets instead. This would result in having to source material for the digesters from even less sustainable sources further afield and/or switching to using waste material as the feedstock.

Although the present proposal is to use crops and hay as the feedstock for the digesters, the possibility of using waste instead, both vegetable and animal, remains an option. This would hugely increase the environmental risk and create a horrible stench from handling the material. The material would also be coming from further afield which would be even less sustainable. The use of vegetable and animal waste material is therefore totally unacceptable.

#### Conclusion

The Parish Council reiterates its view that this is not the right place to locate such a large industrial scale facility and operation. The adverse impact and harm outweigh the benefits by far.

The Council therefore trusts that WBC will refuse this application. However, in the unlikely event that WBC is minded to approve it we also include at **Appendix A** some measures which WBC could take to mitigate its impact.

Yours sincerely,

Mrs. Elizabeth Halson  
Swallowfield Parish Clerk

## **Appendix A**

### **In the Event that WBC Recommends Approval**

Construction would inevitably cause nuisance to residents living nearby and on the route of the construction traffic. It would be a source of noise, dust and fumes - potentially in unsocial hours. A management plan would be required to address these concerns and protect the amenity of residents.

Strict conditions would be needed on highways along the following lines:

- a. Requiring all HGVs and tractor-trailer combinations to use the route along Church Lane from its junction with the A327 at all times, prohibiting travel past Farley Hill School or through the ford at the bottom of Jouldings Lane were this to be re-opened.
- b. Limiting the times of such vehicle movements to daytime hours on weekdays only.
- c. Prohibiting such vehicle movements during school drop off and pick up times.
- d. Restricting the overall total numbers of vehicle movements in any four week period and the total number and maximum frequency of such vehicle movements in any given day.

On the basis that the analysis of vehicle movements relies on a reduction in the historic levels in order to meet the claimed levels, it is necessary for these conditions to apply to all vehicles using the farm site regardless of origin.

The landscape management plan refers to the Butler family by name and should instead refer to the owner so that responsibility passes to any future owner and operator.

Extra attention should be paid to minimising the impact on landscape and views by suitable measures.

Measures would be needed to reduce the impact of the road access on residential amenity, particularly for those residents nearest the entrance.

A commitment needs to be secured for the hiring of professional expertise to operate the facility.

A condition is needed preventing (or restricting to an absolute minimum) the use of waste as feedstock for the digesters as an alternative to green vegetable matter.