

27<sup>th</sup> August 2015

**Attn: Graham Vaughan**  
Planning Department  
Wokingham Borough Council  
Shute End  
Wokingham  
Berks RG40 1WR

Dear Graham

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

Swallowfield Parish Council is responding to the additional and amended information provided in connection with this application. The additional information does not change the Council's position and its continued **strong objection** to this proposal. The additional detail in the transport statement only reinforces and increases the Council's concerns.

**Transport Statement**

***Large Catchment for Sourcing of Feedstock***

It is proposed to source over **25%** of the feedstock from Maidenhead. This is 6000 tonnes which requires 400 single way movements by 30 tonne HGV. This is a massive proportion being transported over a substantial distance. Clearly this is because the material cannot be sourced from local farms at a time when the economics of growing crops for digesters is favourable. It is to be expected that the economic balance will shift such that at some point in the lifetime of the plant this land use becomes less favourable and this will result in either having to source this material from even further afield or having to change the feedstock to include material of a far more undesirable nature such as animal waste and putrescible food waste.

***Dubious Green Credentials***

This type of facility is successful when the majority of the feedstock is generated within the confines of its location and this is clearly not the case here.

The distances involved in sourcing the feedstock for Hill Farm are considerable and this adds considerably to the carbon footprint of the operation when the amount of diesel fuel required to transport the material is taken into account. This must be offset against the green credentials of biogas as a source of energy. It is more normal for such facilities to source their feedstock on-site and locally.

Furthermore, expert sources such as the soil association and within Government Departments (DEFRA and DECC) are now calling into question the wisdom of installations that rely on purpose grown crops.

### ***Implications of Type of Feedstock***

Other digesters, including the “comparable” example now referenced in the application, at Rainbarrow Farm near Dorchester, use a mix of feedstock so the Council believes that such a change would be feasible at Hill Farm with relatively minor modification and worse still may become essential for the continued economic viability of the plant. Given the proximity of the plant to the resident population of Farley Hill and the school, this would give rise to significant issues, as these would constitute sensitive receptors for the unpleasant odours that would arise, the implications of which are **not being assessed** in this application. The Council believes that it is insufficient to rely on assurances from the applicant that this would never happen and that this possibility, whether restricted by planning conditions or not, should be considered at the outset when all the implications can be taken into account. Once the plant is in existence, an application to change the feedstock mix would be more difficult to resist because it could affect the future viability of the plant in a scenario where, if it had been assessed at the outset, the installation might never have been permitted.

### ***Nature of the Traffic***

It cannot be emphasised strongly enough that these tractor and 18 tonne trailer combinations are noisy. You require a large powerful tractor (200HP plus) and the trailers must have air brakes as would the 30 tonne HGV.

The “before and after” comparison of traffic movements gives a misleading impression that there will be little difference. A similar before and after comparison by weight transported would yield a very different picture. Although a proportion of these vehicle movements will apparently be taking the place of existing traffic movements, the difference in vehicle types is vast. Existing traffic comprising predominantly cars, vans and pickups has far less impact than the large and noisy vehicles that will replace this traffic. The greater harmful effect of these larger vehicles on local amenity and safety must be taken into account.

The Council’s previous comments about the frequency and incessant nature of the traffic day in day out, week in week out, year in year out still apply. This is not a seasonal operation.

### ***Proximity of the Plant and Access Routes to the Resident Population***

The example of a “comparable” installation (Rainbarrow Farm) is situated well away from resident population (about 1km from Poundbury) and its feedstock is sourced locally. It has excellent access to the primary road network (the A35 and A37) which **does not pass any houses**. Despite all these advantages, concerns were raised about the transport impact at the application stage. The situation at Farley Hill could not be more different and is dire by comparison.

The new track to the proposed installation passes within just a few metres of the back gardens of houses on Church Road at the top of Jouldings Lane. The school, Woodbury (sheltered accommodation) and Cheriton Farm are approximately 200 metres away.

There is no doubt that the access route from the A327 is far from ideal. It is narrow, traffic is sometimes forced to mount the footway and elsewhere there is no footway at all. So there is a safety issue to be taken into consideration. There is housing all the way up the hill to the junction with Jouldings Lane and there will be extra noise as these heavy vehicles are forced to stop and start and engines labour to get up the hill.

The proximity of residential housing and the school is in sharp contrast to the situation at Rainbarrow Farm. This is very apparent when looking at the two clips of maps in the appendix to this letter which have been reproduced from Ordnance Survey at the same scale.

### ***Unsuitability of Access Routes***

Despite previous statements that ALL traffic would travel to and from the facility in the A327 Arborfield direction, it now transpires that this is not to be the case. Some traffic would be taking the route passing significant centres of population along Swallowfield Street and Church Road from Swallowfield through the whole of length of Farley Hill and past the primary school. Even if this traffic is restricted to outside school pick up and drop off times, the noise of the vehicles will be disruptive to school activities. Furthermore, negotiating Salter's Bridge in Church Road, Swallowfield with the lack of pavement through to All Saints church, its 18 tonne weight restriction and it being impassable to HGVs and long vehicles make this route extremely risky from a road safety viewpoint.

### ***Taking Proper Account of the Harmful Impacts***

All the harmful impacts including harm to local and residential amenity, inconvenience to residents, road safety and danger, environmental risk, harm to landscape character, etcetera need to be taken into proper and full account in the overall assessment and weighed against the environmental benefits which in this case are limited for reasons such as the large catchment for feedstock.

The Council believes that the Highways Department does not take into account the harm the traffic may cause to local amenity and in the Council's opinion have underestimated the impact from a road safety viewpoint.

The applicant has sought to mitigate the harmful effects by suggesting that there could be benefits to the local community such as mains gas and district heating but these are not part of the application, would be prohibitively expensive and are frankly fanciful. Consequently these suggestions should be discounted completely.

The Council accepts that green energy is a priority nationally but this is not a reason for overlooking or underplaying the negative impacts which are many. The harmful effects should be weighed up in exactly the same way as in any application. The Parish Council believes that insufficient weight is being given to the degree of actual harm that would be caused by this proposed development.

### **Lagoon Landscaping**

The Council contends that landscaping should not be accepted as the primary means of legitimising an otherwise unsightly and unacceptable installation in the countryside. This principle has been upheld by planning inspectors, e.g. at the appeal for a Builder's Merchant use at the Balcombe Nurseries site on the Basingstoke Road. No amount of landscaping alters the fact that this is an enormous unsightly installation.

The lagoon of nitrogen rich liquid is only a few metres uphill from a significant watercourse, the River Blackwater which feeds the River Loddon and subsequently the River Thames. The adverse impact of leakage would be devastating and so the risk is significant even if the probability of such an occurrence is low. Consequently this risk should be taken seriously.

### **Conclusion**

The Parish Council understands the need of local farmers to diversify and maintain other rural businesses and is supportive of this where it can be demonstrated that the benefits outweigh any harm.

However, the harm in this case is substantial and the green credentials are undermined by the large catchment area for, and transportation of, feedstock.

The location of the proposed plant is too close to populated areas and the traffic generated will have a substantial harmful impact. It will be harmful to the lives of too many people locally and this is simply not acceptable.

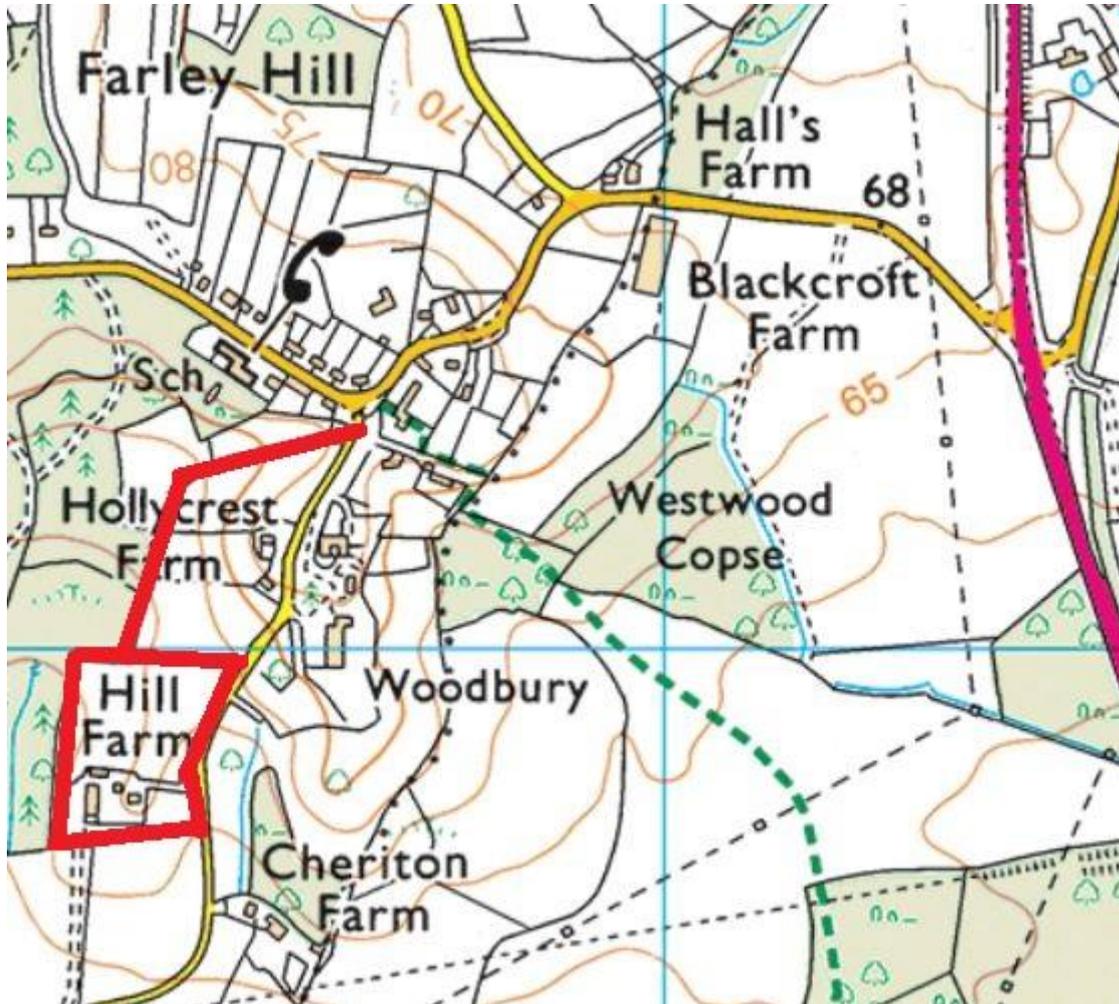
Swallowfield Parish Council contends that, whatever the arguments for this form of energy generation, this is an **inappropriate location** for an anaerobic digester on this scale. The Council therefore reaffirms that it **objects strongly** to this proposal.

Yours sincerely,

Mrs. E. Halson  
Parish Clerk

**Appendix – Maps contrasting the location of digesters relative to populated areas**

Hill Farm, Farley Hill. It can be seen that the facility and the route in and out of it come into close proximity to residential housing and the school.



Rainbarrow Farm, near Poundbury, Dorchester. It can be seen that the immediate surroundings are completely devoid of population and the route to the site from the A35 does not pass any houses at all. The population of Poundbury is a kilometre away, the other side of the A37 / A35 ring road.

