

# West Wickham Parish Council Response to CCC/23/110/FUL (Anaerobic Digestion Facility at Streetly Hall Farm)

West Wickham Parish council objects to the application by Mr C. Covey of Streetly Hall Farm to construct and operate an anaerobic digestion renewable energy facility at Streetly Hall Farm, Webb's Road, Streetly End.

If the officer is minded to recommend approval of the application the Parish Council requests the application be referred to the Planning Committee for determination.

The Parish Council objects on the following grounds:

**1) Contrary to Local Plan Policy NH/2 the application does not respect, retain or enhance the landscape character and distinctiveness of the area.**

Even with mitigation measures this development is an intrusive industrial presence in an otherwise undeveloped landscape.

Streetly Hall is located on the transition of two character areas identified as 'The Linton Chalk Hills' and 'West Wickham Wooded Claylands' Landscape Character Areas. These areas are both recognised as having strong character and good condition in the Greater Cambridgeshire Landscape Character Assessment<sup>1</sup>. The landscape assessment describes key characteristics of Wooded Claylands as 'Gently rolling, elevated, arable landscape forming a lowland clay plateau' and 'Open, peaceful and rural landscape'. This description is absolutely appropriate to this site in its current condition. 'Rural Tranquillity' is listed as a key landscape sensitivity. The proposed location and its surrounds embody the typical landscape characteristics of the area and contribute positively to the rural character of the locality.

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<sup>1</sup><https://www.scambs.gov.uk/media/19123/cd510-excerpts-from-greater-cambridge-landscape-character-assessment.pdf>

This proposed development is entirely discordant and disruptive to the current landscape character:

- A. Of the sixteen viewpoints selected for the Landscape Visual Impact Assessment only two currently contain any significant developed structures (views 11 & 12 feature the existing Streetly Hall farm buildings). The lack of existing man-made structures is a key element of the rural character. If permitted this development will become the defining visual element in the majority of the viewpoints.
- B. The height, scale and bulk of the digesters and intake building are dramatically out of scale with any other structures in the Parish. The applicant has attempted to follow guidance to reduce their apparent mass by avoiding prominent ridgeline sites and by appropriate use of colour and planting. However, we consider this has not been successful. It is simply not possible to satisfactorily mitigate the impact of such large structures in such a sensitive undeveloped landscape.
- C. The noise from the site and large vehicle movements to service the facility will detract from the otherwise peaceful and tranquil character of the area.

## 2) Contrary to Local Plan Policy CC/2 this development has unacceptable adverse impacts on the amenity of residents in West Wickham and other local villages.

This is due to:

- A. **Increased amounts of traffic, especially large vehicles moving on narrow, rural roads.** It is accepted that modern agriculture generates large numbers of large vehicle movements, especially at peak times, however this development creates high additional volumes of intra-farm traffic often where both departure and destination are poorly connected to the major road network.

The proposed new access to Streetly Hall Farm from the A1307 that will carry 75% of the proposed traffic serving the site is considered to be inadequate to serve the development proposed, by reason of its poor alignment, restricted width and lack of passing provision of vehicles waiting to right turn off the A1307 onto the new access road. The proposal, if permitted, would be likely to give rise to conditions detrimental to highway safety. Contrary to DP/3 (1.b. states: Appropriate access from the highway network that does not compromise safety, enhanced public and community transport and cycling and pedestrian infrastructure).

Even if issues with the junction design onto the A1307 can be resolved, partner farms in Balsham and Bartlow will still have to use minor roads, moving through rural settlements, in order to access Streetly Hall. According to Table 3.4.1 in the applicant's Transport Statement annually there will be:

- a. 550 large vehicle movements from the partner estate at Grange Farm, Balsham, will pass through Balsham and transit a section of badly sighted narrow road between Balsham and West Wickham.



Blind corner & rise on C class road without centre line between West Wickham and Balsham (credit Google)

- b. 900 large vehicle movements to the unspecified 'Partner Farm' in Bartlow. Access to the site via the new A1307 access will also pass through Bartlow on a very narrow section of road without footpaths.



No segregated footpath in Barlow on the route between Bartlow Estate Farm and Streetly Hall Farm (credit Google)

- c. No indication is given of where the 'Other Farms' or 'Other agri waste sources' are but they account for over half the large vehicle movements. No indication is given as to what settlements would be impacted but with 2800 movements a year the impact could be severely adverse.



Unclassified road to Streetly Hall Farm, note the verge damage where large vehicles regularly leave the metalled surface. (credit Google)

It should be noted that each movement in the Transport Statement equates to a round-trip so the vehicle will pass through these areas twice. HGVs and tractors with large trailers are particularly noisy and disruptive, especially when moving at anti-social hours during peak times. These large vehicles are also particularly threatening to walkers, cyclists and horse riders.

The Parish Council also requests that the cumulative impact of traffic on the A1307 from this application and from the application to build a separate large scale AD plant at Spring Grove Farm, Haverhill<sup>2</sup> is considered.

B. **Risk of odour and air pollution.** The Parish Council and many local residents have concerns that the Odour Assessment supplied by the applicant is inaccurate and optimistic. There is an obvious conflict of interest in that the Odour Assessment is commissioned by the applicant and thus will inevitably support the application. When air quality consultants are commissioned by others they sometimes come to very different conclusions to the applicant commissioned reports. Consider the Spring Grove Farm AD application being determined by Suffolk CC:

- a. Applicant's report by SLR Consulting<sup>3</sup>: *"assessment has concluded that the Proposed Development would result in a 'not significant' effect at human receptor locations with regard to odour"*
- b. Report by Michael Bull and Associates Ltd<sup>4</sup>: *"it is concluded that there is a risk of significant adverse odour impacts"*

<sup>2</sup><http://suffolk.planning-register.co.uk/Disclaimer?returnUrl=%2FPlanning%2FDisplay%3FApplicationNumber%3DSCC%252F0045%252F23SE>

<sup>3</sup> Conclusion in [Environmental Statement Ch 7 App 7.a Air Quality Assessment](#)

<sup>4</sup> Conclusion in [Jaynic objection review of odour assessment \(MBAL report\)](#)

It is understandable that residents are concerned that using the applicant supplied data in isolation presents a risk. Our initial assessment of the Odour Assessment raised the following concerns and inconsistencies:

- a. The applicant's odour assessment has selected an odour benchmark level of  $3.0\text{ou}_E/\text{m}^3$  (paragraphs 2.4.3 & 4.1.2) as the threshold for significance of impact. This is justified as the nature of the odours from the facility are "likely to be similar to green waste composting and agricultural emissions" and classified as 'moderately offensive'. However, AD facilities also assessed by Redmore Environmental (Blaise Anaerobic Digestion Plant, Client: H&C Consultancy Ltd Reference: 2753-5r1, 9th August 2019<sup>5</sup>) have used  $1.5\text{ou}_E/\text{m}^3$  as 'a worst case assessment'. The widely cited D-NOSEs review of odour measurement techniques<sup>6</sup> describes  $3.0\text{ou}_E/\text{m}^3$  as 'distinct' so well above the threshold for significant impact and we consider that the models should be recalibrated using a  $1.5\text{ou}_E/\text{m}^3$  (very weak to weak) threshold.
- b. Section 3.2.3 states that the design specification of the odour abatement system for the intake and process building has not been finalised. Given that this building will be handling the most odorous feedstocks (poultry litter with an emission rate of  $75\text{ou}_E/\text{m}^3/\text{s}$  according to the sources referenced in the Odour Assessment) this seems to be a major oversight. In addition, the Process Conditions (Table 5 Source 5) gives no justification for the odour emission rate of  $1,000\text{ou}_E/\text{m}^3$  other than stating it will be at the upper rate of the 'Best Available Technique Associated Emission Level' (BAT AEL). Other odour assessments also by Redmore Environmental claim that a UV and activated carbon system 'are consistent with technical parameters specified in the stated EA and EC guidance documents' but 'which will ensure that a treated air odour concentration of less than  $2,000\text{ou}_E/\text{m}^3$  is achieved at all times'. This represents a 100% increase in output odour concentration compared to the calculations used in the application's assessment for an appropriate installation that could be selected by the applicant.
- c. Much of the source data used in the odour assessment is not from high quality peer reviewed sources and references the Odour Impact Assessment for the Biomass AD Facility near Kenninghall, Norfolk<sup>7</sup> which itself references an OdourNet source that does not appear to be in the public domain. It is not clear why this source is considered definitive or correct.

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<sup>5</sup>[https://consult.environment-agency.gov.uk/psc/me19-4pn-bioconstruct-newenergy-ltd/supporting\\_documents/HC163905%20Appendix%203%2027535r1%20%20Odour%20Assessment%20%20Blaise%20AD%20Plant.pdf](https://consult.environment-agency.gov.uk/psc/me19-4pn-bioconstruct-newenergy-ltd/supporting_documents/HC163905%20Appendix%203%2027535r1%20%20Odour%20Assessment%20%20Blaise%20AD%20Plant.pdf)

<sup>6</sup> Ref. Ares(2019)6063082 - 30/09/2019

<https://ec.europa.eu/research/participants/documents/downloadPublic?documentIds=080166e5c7d97c30&appId=PPGMS>

<sup>7</sup>[https://info.south-norfolk.gov.uk/online-applications/files/338BF5F6234D7FE67BB2CF61CEC7186D/pdf/2023\\_0087-ODOUR\\_ASSESSMENT-8057923.pdf](https://info.south-norfolk.gov.uk/online-applications/files/338BF5F6234D7FE67BB2CF61CEC7186D/pdf/2023_0087-ODOUR_ASSESSMENT-8057923.pdf)



### 3) Contrary to Neighbourhood Plan Policy WWK/8 this proposal will impact adversely on the public enjoyment of rights of way.

Specifically regarding the bridleway following the route of the Roman Road which is also part of the Harcamlow way long distance path and the E2 European long distance path.

- A. **The high incidence of large vehicles crossing the Roman Road.** 75% of the projected vehicle movements will cross the Roman road when accessing the site from the new A1307 access. Over 8000 crossings a year and over 30 a day in peak periods. Seeing HGVs crossing the bridleway is discordant with its rural surroundings. This route is an important bridleway. In their submission to this application the British Horse Society holds this section in high regard and considers it a 'destination' for riders, which would be 'not viable' with large amounts of HGV traffic crossing at peak times.
- B. **The visual and odour impacts of the operation of the plant.**
- a. The plant will be highly visible as an intrusive industrial structure in the landscape. Viewpoints from the Roman road in the LVIA:  
(2 & 4) Incredibly claim that although the top of the domes will still be visible the significance after mitigation will be 'minor beneficial'.  
(3) The significance after mitigation is stated as minor adverse, we respectfully disagree as the new structure dominates the vista even after mitigation. The impact will be moderately adverse.  
(5) Impact is acknowledged to be moderately adverse.
  - b. The odour assessment forecasts a 1km section of the Roman Road will fall into the 1.5 ouE/m<sup>3</sup> zone.

### 4) Contrary to Neighbourhood Plan Policy WWK/6 the application does not include a schedule of the light equipment proposed including luminaire type, mounting height, aiming angles and lumen unit levels.

Statements made to the Parish Council by the applicant that the site will be dark and not unnecessarily externally illuminated in hours of darkness are welcome. However, our Neighbourhood Plan requires further details if any external lighting is required.

5) Contrary to policy NH/3 which deals specifically with the protection of agricultural land where it would lead to the irreversible loss of grades 1, 2, or 3a agricultural land unless the land is allocated within the local plan or sustainability considerations and the need for development are sufficient to override the need to protect the agricultural value of the land.

8 hectares of high-quality and versatile land will be permanently taken out of agricultural use through a 2 metre thick concrete plinth that will span the site.