

## **Withersfield Parish Council Response to CCC/23/110/FUL**

### **(Anaerobic Digestion Facility at Streetly Hall Farm)**

Withersfield Parish Council wishes to strongly object to the proposal to build an anaerobic digester at Streetly Hall Farm.

The Streetly Hall Farm site is approximately 2.5 miles from Withersfield. The environmental and traffic consequences of this development will directly impact Withersfield Parish. Although the application is being dealt with by Cambridge County Council, we wish to ensure the views of Withersfield Parish are taken fully in to account.

We identify a number of areas that we believe make the proposal inappropriate.

#### **Traffic concerns**

The number and distribution of the journeys of large vehicle movements is held to be 5,368 per year. Given a movement is defined as a large vehicle going in and out of the plant, the true figure is 10,736 journeys per year. A quarter of these journeys will not use the new access road to the site but will instead go through the villages of West Wickham, Balsham, Horseheath and possibly Withersfield. The small village roads are ill-equipped to cope with HGV traffic. Further, villagers taking their children to school, horse riders and cyclists will face very arduous experiences.

The impact on the A1307 of the significant increase in traffic will be considerable, particularly as most of this will be slow moving causing backlogs and delays on what is already designed a high casualty route. The cumulative impact on the A1307 with respect to another proposed AD plant at Spring Grove Farm near Haverhill/Withersfield will also be considerable and is not assessed.

In addition to large vehicle movements, there is a large increase in farm traffic, which again is not estimated. How these farm vehicle movements will be routed, how many of them there will be, and what materials they will be carrying also needs to be specified and their impact on the local road network.

The proposal claims that feedstock will be sourced from a 10km radius of Streetly Hall Farm. This is a hope and not a binding commitment, and feedstock may well be sourced from a much wider radius, particularly if the AD plant in Haverhill is constructed and in competition for feedstock. Second, the proposal does not specify the precise mix of feedstock that will be sourced. Both these issues make it impossible to quantify the environmental impacts and the number of movements of HGVs and the impact of traffic in the area and surrounding areas.

There is no assessment of the possible impact of the proposed AD Plant, Spring Grove Farm, Withersfield, Suffolk, which is proposed to be sited 2.5 miles away (Suffolk County Council, SCC/0045/23SE). The combined effect on traffic and road safety of having two large AD plants along the A1307 is not assessed.

#### **Roman Road**

The impact this industrial plant will have on the Roman Road will be considerable. The plans will involve a large number of vehicles crossing the Roman Road, up to 100 per day. This will negatively affect the Roman Road and the London to Walsingham Pilgrimage route, both documented in guidebooks and on websites. This clearly indicates that this landscape offers recreational opportunities where experience of landscape is important.

The Roman Road is a nationally promoted footpath which is described in guidebooks and the website Friends of the Roman Road and Fleam Dyke (<https://frrfd.org.uk>). This website lists accommodation at The White Horse Inn in Withersfield, suggesting this area is on the tourist map.

The Roman Road is a well-used bridleway, with horse-riders, walkers, cyclists, and their experience of the bridleway will be strongly negatively affected by the building of the plant. There is no acknowledgment of this in the proposal.

Recorded as Stretliae in 1086, Streetly means “clearing by a Roman road or street”. Many Roman finds have been reported from this area. The AD plant traffic strongly threatens this heritage.

### **Danger to groundwater**

There is no risk assessment of the dangers to surface water from the plant, from possible leakage or breaches to the digestate tanks.

The proposed development is in an area designated for the protection of groundwater source. No AD plant can guarantee a no-spill rate. The highly polluting nature of digestate means that the risk of any spill on the groundwater will be extremely damaging.

In addition, the applicant is storing silage and poultry wastes on site, these further add to the risk to groundwater through the leachate of these materials.

### **Danger to villages**

The proposal provides no risk assessment of the real possibilities of failures in the plant. There have been a number of recent explosions at similar plants, most notably in Oxfordshire due to lightning strike. The possibility of the high-pressure methane tanks being breached, either by lightning strike or by other means, is not addressed by the proposal, though the effects of such a breach will be severely hazardous to local villages.

Further harm from the plant may be caused by particulate emissions from the operation of the facility. This may be from the everyday operations of the plant or from the flaring off of surplus gas. Given the proximity of local villages, this again is a significant concern.

### **Noise and light and odour pollutants**

We are concerned at the impact of noise coming from the proposed plant. In the presentation made by Chris Covery at West Wickham (18<sup>th</sup> November 2023) he gave a comparable example of an AD Plant at Euston. Withersfield Parish Councillors made a visit to Euston earlier this year. Our finding was that the noise levels are considerable. This would include not just the arrival and departure of HGVs but also from the operating of mechanical diggers on a regular and very frequent basis, and from the plant required to purify methane, separate and clean CO<sub>2</sub> and generation of electricity.

The plant would require security fencing and site lighting, which will add to the negative visual impact. Gas flaring will also be very visible and detrimental.

Proposals to screen the plant are unrealistic, given the size and scale of the plant (the tallest structures are 17 metres high and will be on a hill).

The AD plant stores silage and chicken and other animal waste. These are strong odours and will be present on site and in the delivery of vehicles through the village roads. The prevailing winds will inevitably carry any odours towards the local villages.

### **Visual impact**

The proposal would introduce an intensive commercial type of development into this rural area which would have a significantly adverse harmful impact in views across this area of South Cambridgeshire. And it would be detrimental to the quiet enjoyment of the area by residents, users of bridleway and the historic Roman Road, because of site coverage with buildings, structures and lagoons, the height of buildings and structures, need for lighting and security fencing, the increase in traffic accessing and departing the site including the proposed use of tracks and fields by vehicles to access the site.

The proposal conflicts with policies in the development plan, the National Planning Policy Framework and other (national) planning guidance. It is also contrary to Local Plan Policy NH/2t. The adverse impacts of the proposal would significantly and demonstrably outweigh the purported benefits claimed by the applicant.

### **Green credentials**

We are concerned that this proposal is being presented as “green” technology, which will positively contribute to reducing the country’s reliance on carbon fuels and hence help to combat global warming. The proposal indicates that the biomethane will be injected in to the gas main locally. But there is no agreement for this to happen and the alternative is for the biomethane to be transported by road in tankers to Hull, 160 miles away, to be exported by ship. This would hardly constitute an environmentally sound approach.