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Sent: 28 October 2022 14:00

To: Planning Enquiries <planning_enquiries@herefordshire.gov.uk>

Subject: 222728 - Planning application comment was submitted

The following is a comment on application **P222728/N** by '**Simon Harmsworth**'

Nature of feedback: objecting_to_the_application

Comment:

Please see attachment.

Attachment:

P222728N_Representation.pdf

Their contact details are as follows:

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Ocle Pychard

Infrastructure from Section 106 to consider:

Link Id:

https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=222728

Form reference: 854457

Number: P222728/N

Case Officer: Rebecca Jenman

I am writing this in response to Planning Application P222728/N – the anaerobic digestion plant at Whitwick Manor.

The line I shall take in this response is that, while anaerobic digestion is conceptually a green and laudable process, the scale of this proposed development is too large, both on site and in traffic terms, for the location in which it is proposed.

PLANNING POLICIES

As a planning application, the proposal should conform to the Yarkhill NDP (which was made in 2018), the Herefordshire Council Core Strategy and the National Planning Policy Framework.

The Yarkhill NDP tells us:

Policy Y2 (Settlement Boundaries) indicates that the site is not within Settlement Boundaries and this means that it must conform to the Core Strategy Rural Areas policies.

Policy Y5 (Protecting Existing Areas of Employment and Encouraging Investment in Business Opportunities) discusses *small scale* employment development.

Policy Y6 (Supporting Rural Diversification) confirms that RA5 and RA6 are appropriate and it discusses appropriate *small scale* rural businesses.

Yarkhill is a rural parish which has a population of 326 (2011 census). Their NDP tells us that they feel that *small scale* rural businesses can benefit their area.

So, in order to pass the policies of the NDP, the proposal must demonstrate that it is of a small scale.

Core Strategy RA6 tells us:

Planning applications which are submitted in order to diversify the rural economy will be permitted where they:

- ensure that the development is of a scale which would be commensurate with its location and setting;
- do not cause unacceptable adverse impacts to the amenity of nearby residents by virtue of design and mass, noise, dust, lighting and smell;
- do not generate traffic movements that cannot safely be accommodated within the local road network; and
- do not undermine the achievement of water quality targets in accordance with Policies SD3 and SD4.

Again, it puts limits on the scale of the development, both in terms of the site location and on the traffic that the proposal will generate.

So, in order to pass the policies of the Core Strategy, the proposal must demonstrate that it is of a proportionate scale and not generate excessive traffic.

HOW BIG IS THE SCALE OF THE PROPOSAL?

The plant is headlined as an anaerobic digester but it has other functions involved in it, such as a large grain store. The combination of these functions has created debate as to whether the proposal should be described as industrial, waste or agricultural. The multiplicity of functions already begins to hint at a large-scale combined operation.

So, what does their proposal say about the scale of the plant? I shall quote data from their Planning Statement, Layout Plans and Transport Statement. They do not always display all the calculations in their document. Therefore, especially in the Transport Statement, it is not clear how they arrive at their conclusions but all I can do is quote the results that they present.

TRAFFIC

The Transport Statement attempts to predict the effect of the levels of traffic on the A417.

Para 4.2 tells us that 54% of vehicle trips that will access the site will be 29t HGVs.

The 29t refers to their capacity of the trailer; their gross weight is 44 tonnes and these are the largest trucks that can be used in the UK.

Para 4.4 tells us that tractor deliveries will happen 7 days a week and that HGV deliveries will happen 6 days a week. Para 4.5 tells us that there will not be a restriction to certain hours.

Para 4.8 tells us that the increase in volume will be an extra vehicle every 5 minutes at peak times. Para 4.10 tells us that the number of HGVs on the A417 will be increased by 9.9%

It claims that these increases are “negligible”. My claim is that a 9.9% increase in HGVs (and let’s remember that these are huge 44 tonners) and continuous extra traffic 24 hours a day over 6 or 7 days a week is definitely not negligible at all. My suspicion is that residents on the A417 will share my view.

Each extra vehicle is not one that is simply in-transit on the A417. Each one will slow and turn into the site and, on exit, will turn out of the site and move away. Thus, each entry and exit will slow the flow of the A417. This is on a curved, double-white line, national speed limit section of the A417. It’s not difficult to speculate that this will frustrate the normal in-transit traffic and potentially cause even more risky overtaking manoeuvres than we already get.

The Transport Statement limits itself to the A417 between Newtown and Burley Gate. It pays no attention to where the vehicles come from or go to beyond that.

The Planning Statement tells us that “STL Energy is working with Avara Foods on this project. There is a commitment by Avara to bring poultry manure from its existing poultry units in in the Wye catchment areas to be used at this site.”

The Avara geographical footprint is large and so there will be many road miles associated with the delivery of the manure. It would be nice if the Statement could make an estimate of the average distance travelled in one delivery. When questioned at the Yarkhill Parish Council meeting, the applicant was asked for such an estimate but he would or could not give one.

Yarkhill and other neighbouring Parish Councils (Ocle Pychard, Stretton Grandison amongst others) have voted against this proposal for various reasons; but each includes the volume of traffic that will pass along their roads. Some councils which have nurseries and schools on these roads, mentioned potential problems over traffic at pick-up times.

Although it is focussed on Yarkhill and its neighbouring parishes, this network of traffic will spread across Herefordshire.

THE SITE

The site is between 45 and 50 acres and, from their Layout Plans, it can be seen that there are a number of sizeable buildings in the development.

For the purposes of this calculation, I shall ignore all the buildings that are shorter than 14m and I shall concentrate on those above that height since they will be the most obvious and overbearing ones.

There are thirteen buildings and storage tanks with heights between 14.5 and 16.5m. This is about the height of two average houses stacked on top of each other.

The combined footprint of these buildings is 10110 square meters. To get a feel for that statistic, they cover a combined area more than three times as large as the footprint of Hereford Cathedral and their height is almost as high as the nave (19.5m).

There are two particularly large buildings that I would like to draw attention to:

- Covered Feed Stock Storage Clamps (86m long, 70m wide and 16m high).
- Grain Store (152m long, 33m wide and 16.6m high).

The grain store on its own has a footprint over one and a half times that of Hereford Cathedral and is almost as high as the nave.

Just to reinforce the visual image, if you look at the long side wall of the grain store, and using the length unit of a Routemaster double decker bus, it is 18 buses long and almost 4 buses high.

I would like to draw one last analogy that points to (lack of) proportionality. Yarkhill has 130 houses (2011 census). If we assume that the average house is equivalent to an average 3- or 4-bedroom house, the footprint of all the site buildings (short and tall) exceeds the combined footprints of all of Yarkhill's houses' build-footprints. This is certainly not proportionate.

The size and number of these buildings can, by no stretch of the imagination, be considered small or proportionate in the parish of Yarkhill.

COMPARISON TO COURT FARM, HAMPTON BISHOP

The Planning Statement tells us that the applicant has an anaerobic digestion plant at Court Farm in Hampton Bishop.

At the Yarkhill Parish Council meeting, some questions were asked of the applicant that would enable us to make a comparison as to the scales of Court Farm and the proposed development. The topic of the conversation was the amount of traffic that would be produced. The applicant did not at first give an answer but one of the councillors was persistent and asked the question four or five times. At that point the applicant gave some figures that suggested that the amount of extra traffic for the new site would be ten times that traffic for Court Farm. I realise that we shouldn't take that as an exact value, given that the applicant was being asked to make estimates on the fly, but I think it is fair to say that the scale of the new site will be much larger than Court Farm.

CONCLUSION

The Yarkhill NDP and RA6 tell us that small and proportionate workplaces that do not significantly increase traffic are acceptable.

Is this proposal small and proportionate and will not significantly increase traffic?

No. My feeling is definitely that it is not.

- It will provide a significant increase in traffic. A 9.9% increase in the number of huge HGVs on the A417 and generally increased traffic potentially 24 hours a day over 6 and 7 days a week. This is a significant increase in the traffic level and that threatens road safety and is an unacceptable adverse impact to the amenity of nearby residents.
- The site is large and contains many sizeable buildings on the site. Restricting our study only to the tall buildings we see a footprint over three times the size of Hereford Cathedral.

The size of the site also implies threats in the form of:

- Noise pollution
 - Light pollution
 - Air quality pollution
 - Wildlife habitat
 - Loss of prime agricultural land
- Estimates show the size of the proposal is many times larger than the applicant's existing site. This existing site is not small so it is impossible to argue that the new site is on a small scale.

Therefore, I would like respectfully to ask you not to approve this proposal.

Simon Harmsworth