

Planning application comment was submitted on the **03 October 2023 11:17 AM**

The following is a comment on application **P222728/N** by **tim finch**

**Nature of feedback: Objecting to the application**

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**Comment:** I would like to object to this proposal

**Attachment:**

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Their contact details are as follows:

**First name:** tim

**Last name:** finch

**Email:** 

**Postcode:** HR8 2TD

**Address:** 9 Canon Frome Court

Ledbury

Herefordshire

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**Infrastructure from section 106 to consider:** I am unclear as to what to write here. I can say no more than I already have. Please contact me if you need further clarification as to why I am objecting to this proposal. Thanks

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Link ID: [https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=222728](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=222728)

Form reference: FS-Case-551562269

## Objection template to Whitwick Manor AD application ref # P222728/N

Dear Sir/Madam

I am objecting to the Whitwick Manor AD planning application on a number of grounds.

**1. Untested, unproven, ill-defined technology with a significant potential to worsen phosphate pollution.**

Obviously, a solution is needed for the phosphate pollution in the Lugg and Wye catchment. However, this application for an anaerobic digester (AD) does not provide the solution. ADs do not remove phosphate which remains in the digestate and liquid waste. The industrial scale technologies proposed, to strip the nitrate and phosphate from the process, are untested, with no evidence they will work, especially at this scale.

The application is to process chicken waste generated by Avara-Cargill who admits they are responsible for a significant proportion of the phosphate entering the Wye. In 2001 Cargill was sued by the US city of Tulsa (and settled out of court) so they have known for over twenty years about the pollution their chicken manure causes. It seems extraordinary that one of the largest agricultural companies in the world are now proposing to use untested technologies to strip the phosphates, with no evidence they will work at this scale.

**2. Liquids (digestate) exiting the digester.** Despite a significant number of removal stages there will still be at least 13.5kg of phosphate per annum discharging into water courses. This also assumes that the unproven removal stages operate as hoped or expected.

Discharges to water courses must have zero phosphate levels to meet the Natural England phosphate moratorium.

**3. Phosphate fate** It is not clear where or how the phosphate (and nitrogen) containing material removed from the digestate will be utilised.

If this material is spread in the Wye catchment, the phosphate and nitrogen will make their way back into the river, meaning that there is no improvement and a great deal of exacerbation of the problem. I am deeply concerned that this application won't help the pollution problem and may actually make it significantly worse especially if the technologies do not work as claimed.

We know the Environment Agency does not have the resources to properly monitor or enforce the impact of the proposal.

**4. Phosphate recovery or removal operation and monitoring.** The proposed scheme for recovery or removal is highly sophisticated and technologically advanced, akin to a municipal wastewater treatment works. The application details that only four low skilled workers will be employed to run the whole plant. It is highly questionable whether these personnel will be able to effectively operate and monitor the water treatment aspects, let alone the whole plant, adequately. It is also worthy of note that whilst four workers will be employed, they

will clearly not all be on duty at any given time. Therefore, the actual on-site manpower is more likely to be only one or two people at any one time.

5. **Location versus planning policy:** Siting industrial-scale waste disposal in open countryside is entirely contrary to local and national planning policy. This is not agricultural development; it is a waste management development. The local development plan would direct it to one of the employment sites in the county. Rotherwas is designated in the Minerals and Waste Local Plan (MWLP) as the location for any waste management development.
6. **Planning policy for ADs** Furthermore MWLP declares all new anaerobic digesters should only use feedstock from the farm they are on. I am deeply concerned that this application goes against all planning policy.
7. **Vehicle movements** The application states the AD will be using chicken waste and other agricultural products from across Herefordshire and possibly beyond. Grain, carbon dioxide and soil improvers will be exported. Therefore, there will be at least 1 additional lorry movement every 10 minutes, the majority 29t HGVs including 155 trips per annum of “mixed water treatment chemicals” and 679 trips per annum of sulphuric acid in 28t HGVs. Road infrastructure throughout the area and buildings within the Stretton Grandison conservation area are already damaged by local HGV traffic. Significantly increased traffic is a major impact of this application.
8. **Ammonia/ air pollution.** There will be increased air pollution centred on, but not exclusive to, the site. Air pollution damages health and kills. Ashperton Primary and Townsend Nursery Schools are both sited next to the A 417 – a major route to the proposed AD. Ammonia concentrations in the area are already at least 2.5 times the level harmful to biodiversity and resultant nitrogen deposition adds to water pollution, including the Wye catchment.
9. **Noise:** There is a lot of noise generated by ADs beside additional traffic and potential gas flares – see points 10 and 11. There is constant traffic **within the site** moving feedstock, chemicals and digestate around, including the use of reversing beepers, the noise of the feedstock mixers and combined heat and power plants if they are used.
10. **Noise from increased traffic.** The application considers only the noise pollution from the AD itself. The noise impact of the increased traffic has been ignored. This much heavy traffic will contribute significantly to noise pollution in the area, especially as the AD is proposed to operate 6 days a week, 12 hours a day.
11. **Noise from the methane flare** The AD will produce methane which is proposed to be injected into a mains gas pipe near to the site (though again the technical details on this are lacking). When the methane is not pure enough or there is another technical problem, the methane will be flared off. As well as being a climate change nightmare and something that is normally seen at an oil rig, flares also produce a lot of noise.

12. **This AD may become the 'waste management' site for new IPU applications within the Wye catchment.** This has become the solution for all IPU applications in Powys, with one sending its manure to an AD in Whitchurch, Shropshire and another one sending it to the AD at Talgarth, the owners of which have been prosecuted for polluting the Llynfi [REDACTED]

[REDACTED] Pollution incidents from ADs are commonplace.

Such risks should have been addressed in the Environmental Statement. They have not.

13. **Whose waste is this AD for?** Is this AD purely for Avara's waste? It appears to be a significant understatement of the amount of waste generated by Avara.

Could this AD attract chicken waste from outside the Wye catchment? An IPU planning application in Wales met the Habitats Regulations problems of manure disposal by saying the chicken waste would be sent to Gamber's AD on the English side of the border. (This case may be subject to a judicial review). If the Welsh IPUs see the Whitwick AD as a solution for their waste, it may attract additional chicken waste into the Wye catchment. I am concerned that these important questions have not been addressed.

14. **Future feedstocks for the AD.** Will there continue to be as many chickens in the Wye catchment as there are now, especially in the light of avian flu controls and the rising costs of feeding and housing the birds? This AD could end up causing import of chicken muck from a wider and wider area, resulting in even more harm from transport.

Alternatively, the AD could be switched to other feedstock such as maize which is well known for causing river pollution due to soil erosion. The Environment Agency will have no resources to be able to enforce the feedstock mix. I am concerned that the proposal could end up worsening pollution in various unforeseen ways.

15. **Light Pollution.** An industrial site on the proposed scale will cause significant light pollution.

16. **Health and Safety.** The security aspects of the site are not clearly detailed. There does not appear to be a perimeter fence. There will be a large amount of moving industrial machinery, numerous chemicals and bodies of water. How will the one or two personnel on site ensure safety?

Yours sincerely,

Mr Tim Finch

9 Canon Frome Court

Canon Frome

HR8 2TD

[REDACTED]