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Sent: 01 November 2022 07:49

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 'Alice Bowerman'

Nature of feedback: objecting_to_the_application

Comment:

1. Obviously a solution is needed for the phosphate pollution in the Lugg and Wye catchment. However this application for an anaerobic digester (AD) is sadly not it. The technologies proposed to strip the nitrate and phosphate from the process are untested, with no evidence they will work, especially at this scale. Much of the phosphate content will remain in soil improver products that will be spread on fields, causing exactly the same problems that the current muck spreading produces. Regretfully we know the Environment Agency does not have the resources to properly monitor or enforce the impact of the proposal. I am deeply concerned that this application won't help the pollution problem and may actually make it worse if the technologies do not work as hoped.

2. Siting industrial-scale waste disposal in open countryside is entirely contrary to national planning policy. Furthermore the draft Minerals and Waste Local Plan 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.

3. 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 approximately 1 additional vehicle movement every 4 minutes, half of which will be 30tonne HGVs, a further 30% will be 20tonne or tractors with trailers. There is no information provided in the application about which routes the traffic will take. However it is probably an increase of 25% in local traffic. Road infrastructure throughout the area and buildings within the Stretton Grandison conservation area are already damaged by local HGV traffic. I am worried about the traffic impact of this application.

4. The application considers only the air pollution from the AD itself. There is also the air pollution, especially ammonia, from the transportation of chicken muck and the storage and mixing of it onsite. This area is already 1.5 times over the recommended limit for ammonia. Ammonia is known to restrict the growth of some plants and also exacerbates human heart and lung conditions such as asthma. There are also the fumes from the HGVs and other vehicles themselves. Ashperton primary school and Townsend nursery are both sited next to the A417 - a major route to the proposed AD. I am very concerned about the impact of this proposed air pollution.

5. The application also considers only the noise pollution from the AD itself. Again the noise impact of the 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 and may well be open beyond those hours, especially during the grain harvesting season. 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. I am worried about the noise impact of this proposal.

6. It is difficult to believe that Herefordshire will continue to host so many chickens, especially in the light of avian flu controls and the rising costs of feeding and housing the birds. I am concerned that this AD could end up causing import of chicken muck from a wider and wider area, resulting in even more harm from transport. Otherwise 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.

Attachment:

Their contact details are as follows:

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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: 854996