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Sent: 31 October 2022 11:03

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 '**PATRICIA HALL**'

Nature of feedback: objecting_to_the_application

Comment:

I object to this planning application on the following grounds.:

1. Untested technology with a significant potential to worsen phosphate pollution

It is my understanding that there is little or no evidence that the technology proposed will, as claimed, strip nitrates and phosphates from the process, especially at this industrial scale. Given the catastrophic levels of nitrates and phosphates that have been found, consistently and over a considerable period of time, in the Rivers Wye and Lugg this is of major concern.

2. Liquids (digestate) exiting the digester.

The application claims that 'on average' up to 95% of phosphate in liquid leaving the digester will then be removed by an alumina clay bed filter. However, this process is entirely unproven and the company which promotes the process says a 'treatability study' should be conducted to test the concept. This has not been done.

According to CQA, the company which has suggested the filtration concept, the design was based on preliminary data of water quantity and composition and there was a 'level of variation and uncertainty about the data'.

Wastewater characteristics must be confirmed before planning approval is given and thought given to the spikes and troughs which are the reality of waste water rather than averages.

5% phosphate remaining in waste water from AD could be more than legal minimum allowed. The 5% phosphate which may still remain could represent far more than the legal minimum allowed to enter the river catchment due to the quantities of chicken waste being processed. The application asks that this waste water may be discharged to a surface water course, subject to a discharge consent. Discharges to water courses must have zero phosphate levels to meet the Natural England phosphate moratorium.

3. Phosphate contaminated filter media It is proposed that the phosphate is "filtered" by the alumina clay beds with the phosphate being retained by the clay medium. It seems that once exhausted, the clay medium will be excavated and spread on fields. . If the filter media is spread in the Wye catchment, the phosphate will make its way back into the river.

4. Phosphate monitoring. The CQA report also states that the inlet and outlet phosphorous levels should be monitored on a weekly basis or more

frequently, as required. Given the many uncertainties and critical consequences of phosphorous contamination on the local habitat the phosphorous levels should not only be monitored and recorded continuously but should also be appropriately alarmed. In addition, the location of the outlet sample point(s) should be clearly defined.

5. Location versus planning policy: Siting industrial-scale waste disposal in open countryside is entirely contrary to national planning policy. This is not agricultural development, but rather 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 MWLP as the location for any waste management development.

6. Planning policy for ADs The draft Minerals and Waste Local Plan declares all new anaerobic digesters should only use feedstock from the farm they are on; this application therefore appears to go against 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 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. Significantly increased traffic is a major impact of this application.

Ammonia/ air pollution. I have concerns about the effect on air pollution of the proposed site. 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.

8. Noise: There is a lot of noise generated by ADs beside additional traffic and potential gas flares – see point 9 and point 10. There is constant traffic within the site moving feedstock 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.

9. 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.

10. 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. Flares produce a lot of noise.

11. This AD may become the 'waste management' site for new IPU applications. 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.

12. Whose waste is this AD for? An IPU planning application in Wales met the Habitats Regulations problems of manure disposal by saying it would be sent to Gamber's AD on the English side of the border. (This case may be subject to a judicial review challenge). If the Welsh IPUs see the Whitwick AD as a solution, it will undermine the claim that it will deal with all of Avara's waste (which relies on a significant understatement of the amount of waste generated by Avara).

Attachment:

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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

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