

Anaerobic Digester at The Old Dairy Chavenage

If making an objection, remember to give your name and postcode and to quote planning reference: S.14/0673/FUL

Email: planning@stroud.gov.uk

Some issues you may wish to mention

Planning issues:

- Vehicle movements: Inappropriate for Chavenage Lane and dangerous... both the road itself because single lane, but in particular the A46 junction. Any accidents or near misses you can cite within the past 3 years with names, rough dates (month and year) and a description of what happened
- Industrial scale development in an Area of Outstanding Natural Beauty. The wrong development in the wrong place. Will set a precedent and it does not need to be here... no animal waste. Developers should find a more appropriate green field site.
- Concern about pollution from inappropriate use of waste digestate and emissions of gas and other nitrous gases
- Noise – this is a very quiet area and we would like to keep it that way. Given other inaccuracies in the planning application that are now coming to light, are we convinced the sound will be contained and not travel
- Smell. As above, given other inaccuracies, are we convinced the smell of digestate and other input material will be contained. How will they deal with the smell of gas emitted through drying the solid digestate
- Safety. How will they contain gas leaks? What precautions are they taking for explosions and leaks similar to those at Harper Adams and elsewhere?

Relevant Planning Legislation and Government Statements

Policy E15 in the Stroud Emerging Plan: ***Farm Enterprise and Diversification***

Development which forms part of a farm diversification scheme will be permitted where the proposal can demonstrate the viability of farming through helping to support, rather than replace or prejudice, farming activities on the rest of the farm and promotes the use of farming practices that have a positive impact on the environment.

In addition, the following criteria MUST be complied with:

- 1. The proposed development will stimulate new economic activity with a use compatible with its location, which maintains the relative sustainability of a rural area including the rural-urban fringe*
- 2. Any new buildings are appropriate in scale, form, impact, character and siting to their rural location*
- 3. Wherever possible new or replacement buildings should be located within or adjoining an existing group of buildings*
- 4. The proposed development will not generate traffic of a type or amount inappropriate for the rural roads affected by the proposal, or require improvements or alterations to these roads which could be detrimental to their character.*

This development will generate traffic that is inappropriate for a number of rural roads – not just the access road to the site which is wholly inappropriate. The development will NOT have a positive impact on the environment and it is NOT appropriate in scale, form, impact, character and siting to its rural location. It will also replace and prejudice farming activities on the rest of the farm and it promotes farming activities that have a NEGATIVE impact on the environment. Maize is bad for wildlife, bad for soil erosion and flooding, and leaves the land bare and exposed as ugly stubble from mid October to mid May. In the original application, the applicant states ‘sustainable development proposals that accord with the relevant local development plan’ should be approved. In our opinion, this is neither sustainable or in accord with the delivery policy above which is in the Stroud Emerging Plan.

We appreciate that this plan has not yet been adopted. However, it has been out to consultation and no challenge has been made that would materially change this particular policy. The NPPF states that weight can be given to an emerging plan from the date of publication.

We believe that this policy is supported by the core planning principles of the NPPF that requires planning decisions to:

- take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it
- Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework.
- Encourage the effective use of land by reusing land that has been previously developed (brown field land), provided that it is not of high environmental value

We believe this is not a sustainable development as defined by the NPPF, there is no need for it to be sited in this green field site within an AONB. It will create a waste product rather than reduce existing waste and we believe, at best, it will be carbon neutral. There are therefore no net benefits to the local community or to the UK as a whole.

In July 2013, the then Energy Minister, Greg Barker, stated that the new guidance on renewable energy will make clear to local planning authorities that: ‘the need for renewable energy “does not automatically override environmental protections and the planning concerns of local communities.’

In a similar vein, the Communities Secretary, Eric Pickles, stated that: ‘Some local communities have genuine concerns that ...insufficient weight is being given to environmental considerations like landscape, heritage and local amenity.’

The Energy Minister completed his announcement with the comment that renewable energy has: ‘a big bright future in the UK, but not in any place, and not at any price.’

In response to a letter from Neil Carmichael, the Minister for Housing and Planning, Brandon Lewis said:

it is not the Government's policy to encourage solely purpose-grown crop-based anaerobic digestion systems, particularly when these are grown to the exclusion of food producing crops, or where growth of these crops might adversely affect biodiversity.

He concluded by saying:

I am unable to comment on live planning applications like this one at the Old Dairy. Local authorities are best placed to decide on the most appropriate strategy for managing waste in their areas, and that facilities for anaerobic digestion are both necessary and situated in the right place. Stroud District Council will want to consider this proposal against the policies in their Local Plan and any other planning considerations such as those raised by your constituent, including its potential impact on the local environment and amenity.

We believe this is the wrong plant in the wrong location.