**Planning Reference:** S.14/0673/FUL

**Inspectorate Ref:** APP/C1625/W/15/3032550

**Site:** The Old Dairy, Chavenage, Tetbury, Gloucestershire

**Representation on behalf of the Parishes of Horsley, Beverston, Nailsworth, Tetbury, Tetbury Upton, Avening and Kingscote, together with Calcot Manor and Tetbury Branch of Council for Protection of Rural England.**

The above parish councils along with 61 members of the public objected to this application. There were no letters of support.

We have read the appellant’s statement of case and have found numerous untrue or misleading statements. We have detailed these in the attached appendix A.

In summary, our objection is:

* There is no specific need or special circumstances for this plant anywhere and in particular within an AONB. No animal waste is produced at Chavenage, the estate is not large enough to produce the majority of the feedstock for the plant and so it will have to be transported from elsewhere. Nor is the farm large enough to take all the waste digestate produced as an end product of the AD process and so this will also have to be transported elsewhere.
* Growing crops for anaerobic digestion is not consistent with Government policy. Please see attached in Appendix D a NEW letter from the current Minister at Defra with responsibility for this policy area which makes quite clear the reservations about the use of crops as a feedstock for AD and more specifically the growing of maize for such plants. See also section 1.4.4 of the Government’s Anaerobic Digestion Strategy and Action Plan via the link below.
<https://www.gov.uk/government/publications/anaerobic-digestion-strategy-and-action-plan>. This explains that Government support for AD is part of Waste Management and that biocrops in AD plants should only be used to facilitate the utilisation of unwanted slurries. This is not the case for this plant.
* The narrow lanes leading to the site are not designed for large lorries. They are used by cyclists, horseriders, joggers, dog walkers and mums out with small children.
* This is a busy rat run between the A46 and Tetbury and 11 accidents or near misses have been reported by objectors in the past 3 years alone. Please see Appendix B for supporting photographic evidence showing the congestion on the lane, the unsuitability of the junction with the A46 for HGV traffic and 3 additional accidents since the decision by Stroud Council to refuse permission for this development. Please also see Appendix C for an updated summary of reported accidents. All of these can be substantiated by witnesses.
* According to estimates from Gloucestershire Highways, this development will generate over 2,700 new vehicle movements including tankers, HGVs and large tractors with trailers. These will peak at 8 movements each hour, ie one every 7.5 minutes. We have questioned the figures given by the appellant, in particular that liquid waste can be ‘backloaded’ on the same vehicles that bring in feedstock. Liquid is transported in tankers; crops or crop silage is transported in trailors or HGV lorries. We have also taken expert advice which contradicts their calculations of the total waste that will be produced. We therefore believe that these transport figures are an underestimate. Given the easily proved untruths elsewhere in the appellant’s statement (eg that the plant is 800m from the A46 when it is 1.6km) we would ask that you check their claims very carefully, taking expert advice where required.
* Quite apart from the danger posed by this traffic, the noise and visual impact of the HGV lorries and the HA’s recommended widening of this rural lane to accommodate them would be detrimental to the landscape character of this AONB.
* The NPPF states that great weight should be given to conserving landscape and scenic beauty in AONBs. The size, scale and form of the proposed chemical plant, industrial in character, mean it will be visible for miles across the rolling Cotswold landscape in all directions. The trees that will be planted to screen it will take 10 – 15 years to have any real impact (more than half the life of the plant) and then only for a few months in summer. There is no provision in the planning application for restoring the site after the 20 year life of the plant.
* The adjacent Calcot Manor Hotel, employs 300 people, attracts over 76,000 visits each year and generates millions of pounds of annual tourism spend. They advertise Chavenage Lane as a safe cycle route for their residents; several of their employees cycle to work this way from Tetbury. This site will be visible from the grounds of Calcot Manor and we request that the Inspector views the site from this property
* There are no benefits to balance these costs. The original planning application states that only job will be created. We have been told by the person who will be employed that he will continue to run his fertiliser business at the farm at the same time. There will be a lower requirement for labour on the land with the change in cropping. There is no subsidised gas or heat on offer to the local community. The developers are speculative investors from outside the area. Construction will be contracted to Biogest, an Austrian company. As this is very specialised construction, our concern is that very little other than the landscaping work will go to local contractors. Local taxpayers will be left to pick up the cost of the substantial damage to the roads.
* This is not ‘green’ energy. While it may use renewable crops, the fossil fuel required to grow and transport the crops, to transport the poultry manure (we still do not know where this will come from but believe it may travel at least 20 miles) and to transport the waste digestate off site is likely to mean there is very little net energy produced and may even be a net increase in Greenhouse gases. It also takes good (grade 2 or 3a) land out of Agricultural production.
* Chavenage Estate already has many farm diversification projects including filming at Chavenage House and elsewhere (eg Poldark), 2 – 3 large motorcycle rallies per year, off-roading activities with 4 x 4 vehicles, a commercial shoot and full participation in the Environmental Stewardship Scheme. We believe some if not all of these would be disadvantaged and put at risk by this development and the subsequent change to cropping.

This submission has been agreed by the following with the support of their respective councils

Allan Caudwell, Horsley Parish Council

Oliver Preston, Beverston Parish Council

Graham Nichols, Kingscote Parish Council

Jim Parsons, Avening Parish Council
Richard Witchel, Tetbury Upton Parish Council

Stephen Hirst, Tetbury Town Council

Myles Robinson, Nailsworth Town Council

Richard Ball, MD, Calcot Manor and Spa

Giles Preston, Chairman, Tetbury Branch of Council for Protection of Rural England

cc. Cllr Tony Hicks, Gloucestershire CC

 Cllr Rowland Blackwell, Stroud DC

**Appendices:**

A: Response to Statement of Case

B: Photo support

C: Accidents on Chavenage Lane

D: Letter from Minister of State, Defra, July 2015

E: Letter from Minister, DCLG (previous Coalition Government)