



The countryside charity
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Chair
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Anaerobic Digester Facility – Charlton Field Lane
APPLICATION REFERENCE 21/00419/EFUL
Objection from CPRE Avon and Bristol

CPRE Avon and Bristol wishes to **object** very strongly to this planning application, on a large number of grounds. These are summarised below.

1. Green Belt

The site concerned is well within the Green Belt and there are no exceptional circumstances that can justify the building of such a large Anaerobic Digester (AD) facility in a Green Belt location. CPRE is in principle sympathetic to the use of anaerobic digestion as a “green” energy technology, but in sensitive rural settings this is usually best achieved by very much smaller “farm” facilities. These proposals are for an industrial scale facility with huge adverse implications for the Green Belt and for neighbouring communities. In support of our contention, we would refer to NPPF Paras 145, 147 and 154 and the relatively recently updated Planning Policy Guidance on the location of such schemes within the Green Belt.

It should also be noted, and taken into account, that the proposals are in effect an attempt to circumvent an existing egregious abuse of planning law. The structures that have already been erected on the site are outside any previous planning consents and are quite correctly now the subject of an Enforcement Notice requiring their demolition. Previous commitments to return the old decomposting site to its natural state and restore the compatibility with the Green Belt have been ignored. We also understand, from the complex and long history of the site, that previous planning consents relate only to much smaller scale waste decomposting facilities, not to AD facilities utilising large quantities of agricultural produce.

B&NES should now ensure that the Enforcement Notice is fully complied with and that the site is indeed properly and fully restored.

2. Technical concerns

CPRE Avon and Bristol has a number of very significant technical concerns about the proposal. The main ones relate to the materials being treated and are as follows:

- (a) 85,000te food waste are identified. (+8,500te). (See 6.27 of PS) and up to 92,000te of feedstock (Table 6.1 of DAS and Tables 4.1 & 6.1 of TA); 24,000te of maize silage; 15,000te agricultural waste; 25,000te of vegetables; 25,000te food waste; 3,000te glycerol and c 75,000te is digestate (liquid and fibre).
- (b) This means that in practice only about 28,000te (30%) is actual waste. Anaerobic digesters cannot be assumed to be climate positive facilities, and particularly where they require energy crops to be grown specifically they can become climate negative in impact.



- (c) There appears to be no information concerning the capacity of the AD (its power) and the proportion of electricity and gas.
- (d) It is normal practice with ADs to apply conditions specifying: the power limit, the locations of the sources of feedstock; the types of feedstock allowed; and the locations of where digestate will be spread. This has not been provided.
- (e) There is no need for the AD to have maize silage and vegetables as feedstock. It could operate solely on food and farm waste (although the farm waste could alternatively be used as fertiliser (manure) or green manure).
- (f) There is no indication of where the vegetables will come from (apart from saying farms) or why they cannot be used as green manure or mulch on those farms.
- (g) Table 6.4 indicates that apart from glycerol and an unspecified proportion of the vegetables (from manufacturing) all the waste comes from farms. There is no need for any of the farm waste to go to landfill or to an AD. It can all be used on farms as fodder or spread on the land as animal manure and green manure.
- (h) There are no sources given for the feedstock and thus no information is provided concerning the total mileage of the 8,447 HGV trips. There is therefore no evidence that the proposal is sustainable.
- (i) Maize at 40te/hectare (6.3.3 of TA) needs 600 hectares of land. This means 2.3 square miles of land taken out of food production. There are many government statements expressing concern at monocrop growing of maize and taking farmland out of food production. It is not necessary for an AD plant to use any crops, such as maize, as a feedstock. What is more, growing bioenergy crops (e.g. maize silage) does not automatically produce a carbon emissions benefit, and could even have been negative in terms of their carbon emissions.
- (j) We have concerns with late harvesting, soil compaction, soil degradation and erosion and run-off. Bioenergy crops, for example, such as maize can be detrimental to soil quality.

This information clearly completely changes the whole character and purpose of the plant, casts major doubt on its “sustainability”, its likely impact on carbon emissions, and its alignment with what is now regarded as “best practice”. It is above all absolutely clear that this is now intended as a major industrial scale facility completely unsuited and inappropriate to a protected countryside location. Furthermore, any reductions in carbon emissions by processing genuine waste are likely to be outweighed by associated activities that increase carbon emissions, such as those from associated HGV movements, and those which have potentially no carbon emissions benefits, such as using land for growing bioenergy products, such as maize. We recommend that the Council requests a full carbon assessment of this facility, which clearly shows any positive and/or negative impacts, and compares this with the significant wider impacts (as discussed below).

3. Local Amenity

As one of the B&NES Officers’ reports notes, a byway runs along the northern border of the site and this constitutes one of a network of footpaths and byways giving good access to the countryside from the now greatly enlarged community of Keynsham. There is now widespread recognition of the importance of good quality access to the countryside for urban communities and proposals that are detrimental to this aim should not be viewed favourably. The site also sits at the top of the hill and the size and scale of the buildings is such that whatever screening is eventually developed they are likely to be visible from other parts of the Green Belt and surrounding countryside, including the important pre-historic site of Maes Knoll which is the next high point to the west.

CPRE nationally has considerable experience of evaluating AD facilities and this only adds to the considerable concern we have over this application. Other plants, and particularly those with “open” silos, as is proposed in this instance, have given rise to significant loss of amenity due to unpleasant and potentially toxic odours and emissions, despite endless assurances by operators that such problems would not occur. When the earlier composting plant on this site was operational, we understand from neighbouring landowners that it was not unusual for unpleasant odours, significantly worse than from normal agricultural silage, to drift across the countryside, including the important network of footpaths to the south as well as to the north of the site. The environmental impact in this respect of an



industrial AD facility of the type proposed will be very much worse. This is of course – and rightly – of huge concern to residents of south west Keynsham, where significant housing development has taken place in recent years and who would be subjected to odours being carried by the prevailing south-westerly winds. It does however also have significant implications for rural residents and amenity use of the neighbouring countryside as well. The impact of ammonia emissions on the environment and on our health is clearly recognised by the Government's Clean Air Strategy, announced in January 2019, which declared its intention to mitigate ammonia emissions from farms. We understand that 2027 will bring a ban on uncovered manure and slurry storage. This is to both to tackle air pollution, and to support farmers to invest in infrastructure and equipment to reduce emissions.

Other amenity aspects relating to walking and cycling are dealt with under the transport and traffic section below.

4. Transport, Traffic and Road Safety

The consultants advising the site developers have prepared extensive and detailed analyses of the transport and traffic implications of the proposed facility. We submit, with respect, that the majority of these are irrelevant to a proposal of this kind in this location, while others seriously understate what will be the “real world” impacts. The additional volumes of very heavy traffic are forecast to be considerable at all times of year and massively so at harvest-time. Our concerns are therefore as follows:

- (a) The A37 Junction: Proposed access to the site is from the A37 junction with Woollard and Sleep Lane. This is a complex junction involving several intersections before actually joining the busy A37. The various intersections themselves are unsuitable for the very heavy vehicles involved in servicing the proposed plant. The resultant “traffic mix” of cars and other light vehicles and local cyclists and motorcyclists is inherently a significant road safety risk. Moreover, we note that the consultants identify a cluster of minor collisions at the junction and draw the conclusion that this indicates there is not a problem. This is to misinterpret the existing data: The existence of this cluster is an immediate indicator that there are difficulties with the current road configuration and traffic at the junction and the introduction of significant volumes of very heavy traffic are only likely to make these difficulties and the risk of more serious incidents very much worse.
- (b) Woollard and Charlton Field Lanes: The consultants correctly describe both Woollard and Charlton Field Lanes as two-lane roads handling normal two-way traffic flows. However, this fails to recognise that these are still essentially rural roads and the introduction of very large vehicles serving the AD plant is something which is well-beyond their design capability and is highly likely to result increased risk for cars and other medium sized vehicles given the actual width of the lanes in each direction.
- (c) Implications for cyclists and walkers: The consultants point out that there are no footpaths for walkers on either Woollard or Charlton Field Lanes. Whilst we recognise that most walkers will tend to use other smaller lanes for recreation, some must use these larger roads for simple day to day purposes and they will be put at increased risk. For cyclists, the problem is more serious: there is a considerable amount of recreational cycling in the Keynsham and Whitchurch area and cyclists undoubtedly make use of almost all the routes around the site. The “mix” of very heavy vehicles and cyclists is deeply undesirable and should be avoided.
- (d) Catchment area for farm produce. We have major concerns about the lack of definition of the catchment area for sourcing farm produce and the implications for traffic.
 - I. Firstly, there are no sources given for the feedstock and thus no information is provided concerning the total mileage of the 8,447 HGV trips. There is therefore no evidence that these aspects of the proposal are sustainable.



- II. The maps that are provided as part of the proposal suggest in non-specific terms that farm produce could be drawn from as far afield as the Cotswolds and the Mendip Hills. We seriously question whether very heavy goods vehicles serving the plant would in practice make the long detour almost into Bristol, before turning south down the A37 for the Whitchurch junction. Indeed, there must be major reservations as to whether that is even desirable given congestion and the nature of the roads from Keynsham round to the junction of the ring road with the A37. Any reliance on the construction of a new road from Brislington around to Whitchurch should be discounted. The road scheme concerned, although part of the “Joint Local Transport Plan 4 (JLTP4)”, is strongly contested, (including by CPRE) as yet unfunded and still highly uncertain. Our concern as regards this application is that heavy vehicles will, come what may, seek to access the site via Keynsham itself, creating serious safety risks and considerable amenity damage to the residential communities and businesses there. In practice this will be difficult to restrict and control.
- III. We also have serious concerns about the likely problems arising if very heavy vehicles seek to access the site from the south and south west (e.g. the Mendips). This will almost invariably mean adding more very heavy traffic to the already heavily over-loaded A37, including vehicles coming through villages such as Pensford, which is already barely navigable for normal-sized HGVs. There are air pollution problems from traffic not only in Pensford, but also in Farrington Gurney and Whitchurch itself which would be worsened by additional volumes of traffic of the nature.
- IV. We also ask the Council to include increases in transport movements, and their impact on carbon emissions, in their overall assessment of this facility and its contribution to the Council Climate Change Strategy.

5. Agricultural impacts

There are several agricultural impacts that cause us concern:

- (a) Farm waste is better treated on the farms and then used as fertiliser (manure) or green manure).
- (b) We are concerned – and unclear – about drainage and water “run off” considerations. The plans appear to show a drainage route running to the north-west of the site as though this is part of the site itself. Consultation with local residents suggests that the site developers do not actually own the corridor of land required for this, leaving open the question of how the proposed drainage arrangements can be secured.
- (c) The site itself, on inspection, can be seen to be partly flooded and there is clearly a groundwater collection and dispersal problem. Notwithstanding the proposals for drainage, there is clearly a risk that water, potentially contaminated, seeps into the sub-strata and in due course contaminates land and streams to the south of the site, including those of a major organic farm lying further down the steep hill towards Woollard. We question whether it is possible to establish arrangements, including enforcement arrangements that can satisfactorily mitigate these risks.
- (d) We consider that the encouragement of the “mono-culture” of maize which production specifically for AD treatment encourages is of itself undesirable in terms of agricultural sustainability, diversity of food production and maintenance of soil quality.

6. Conclusions and summary

For all the above reasons CPRE Avon and Bristol is strongly of the view that this application must be rejected. The amenity damage to the Green Belt is unjustifiable; the traffic and safety implications are unacceptable, the environmental impact on people’s homes will be unacceptable and in overall terms we do not believe that the proposals are environmentally or economically sustainable. We believe that the proposals run counter to a large number of B&NES Local Plan and Placemaking Plan Policies. Planning Officers will be well aware of these, but we would suggest and would cite in this respect: SD1; CP3, 5,6, and 8, NE1, and 2, GB1, PCSI 1, 2, and 3, RE1, ST2A and S17. We also



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seriously doubt whether this facility will provide overall reductions in carbon emissions, and therefore whether it's approval is in line with the Council's Climate Strategy.

Nor do we consider that it is remotely acceptable for egregious breaches of earlier planning requirement to be rectified by an even less acceptable and less appropriate major industrial development. We therefore urge B&NES, as the Planning and Waste Authority not only to reject this proposal but to take the strongest possible enforcement action to remedy the previous breaches.

CPRE Avon and Bristol
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