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## Anaerobic Digester Facility – Charlton Field Lane

APPLICATION REFERENCE 21/00419/EFUL

### Additional CPRE Avon and Bristol comments on proposed Anaerobic Digester plant at Queen Charlton

CPRE Avon and Bristol has already submitted a full and carefully reasoned objection to the proposal to build an industrial scale anaerobic digester plant at this site to the immediate south-west of Keynsham and well within the Green Belt.

We maintain our **very strong objection**.

Since our original submission, the scheme proposers have commissioned a very large amount of supplementary work on numerous detailed aspects of the proposal. This work is all clearly intended to make the scheme more operationally acceptable in the hope that this will facilitate a favourable planning decision.

However, having considered the voluminous and detailed additional material our firm view is that the additional material changes nothing in our original assessment. In considering these proposals we would urge planning officers and Elected members not to confuse operational mitigation with fundamental considerations.

On that basis we will now set out in short and simple terms what we still believe those fundamental considerations to be:

1. **Green Belt:** The site is well within the Green Belt and we can find no “exceptional circumstances” to justify the normal presumption against development of this scale or kind. Earlier, much smaller scale applications have been turned down, making it clear that a proposal on this scale must in terms of logic and consistency be wholly unacceptable. It is also important to keep in mind that at the present time central government policy on planning and the Green Belt is still evolving. In particular, the Government, from the Prime Minister downwards, has committed more strongly than ever before to safeguarding the Green Belt from development. It would be quite wrong for decisions about this proposal to be taken ahead of full clarity about new and greater protection for the Green Belt. We therefore strongly urge B&NES Council at the very least to “pause” the decision-taking process until Government policy is clearer and enacted in new legislation.
2. **Transport and Traffic:** We have already pointed out the unacceptable traffic and safety implications of the proposal. However, the new documents, far from alleviating concern, only serve to heighten it. We expressed the strongest reservations about the area from which it was expected that material to feed the digester would be drawn. It appears from the new documents that this area is now likely to be even greater and that heavy vehicle movements will also increase further. That is unacceptable in both environmental and safety terms. We have the gravest doubts as to whether the proposed traffic management measures can be adequate or, given the scale of what is needed, can be reliably maintained and enforced over a long period of time.



3. **Economic viability:** We fundamentally disagree with the assertions that only large-scale plants of this kind can be economic. The most effective and environmentally sustainable types of anaerobic digester are those that are relatively small scale, serving local farms as a genuine waste recycling facility and not as a consumer of new agricultural produce.
4. **Agriculture and food:** The proposers' arguments that the soils in the surrounding region are good for maize production simply go to show that it is good for other cereal production as well. With supply chains under strain globally and overdue recognition that long-distance food supply is both vulnerable to disruption and adds to the effect of transport on global warming, we believe that it must be a priority to utilise good land for domestic food production, not for anaerobic digester material. If B&NES wishes to ensure that its admirable "climate emergency" policies have real meaning it will be vital to take this sort of consideration into account as well as the more obvious ones. It is vital, locally, that the authorities do not inadvertently "export" the assessment of the carbon and other emissions "balance sheet" into neighbouring areas whilst imagining that the calculation of B&NES own carbon footprint is coming into line with stated objectives.
5. **Local environment, air quality and amenity:** The new documents include extensive assessments and calculations as to the local effects of unpleasant and potentially toxic odour and the impact on quality of life. The technical estimates tend to minimise these. However, CPRE's experience in other parts of the country is that while these minimal impacts are often claimed in advance, in practice, local communities find that that post-completion the impacts are much worse. In this case, the nearby presence of major new housing development directly downwind from the plant, (and carried by the prevailing south-westerly airstreams) makes the likelihood of such effects very high. We strongly recommend that B&NES carries out a careful study of the "real world" impacts of other such schemes compared with projections before reaching any conclusion on this aspect.
6. **Ecology:** Significant damage has already been done to the ecology of this site over the years and this has not been restored or made good despite various requirements for this to be done. The new proposals would involve further significant damage to and disruption of hedgerows at the site. This is unacceptable, as it is now widely acknowledged that hedgerows play a previously undervalued role not only in maintaining diversity of both flora and fauna but also in combatting climate change. Not merely preserving, but increasing the extent of well-maintained, healthy hedgerows needs to be firmly on the agenda of all local authorities committed to tackling the "climate emergency".

In submitting these short additional comments, we have sought to focus on the major issues of principle and practice that still constitute the bedrock of arguments against the proposals. We strongly urge B&NES to focus on these issues of principle and not to be diverted either by a smokescreen of operational mitigation and detail or by arguments that are, frankly, largely "greenwash" and will if accepted do severe damage to B&NES reputation as a leading Local Authority in the region when it comes to a serious understanding of climate change.

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