

## Sibley, Sally

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**From:** Simmonds, Mark  
**Sent:** 03 January 2017 18:05  
**To:** \_planningadvice  
**Cc:** Fidler, Richard  
**Subject:** FW: 170103 BRA144 Tongue End AD

Please scan to H03-0410-16 – 6SUP

Thank you

Mark

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**From:** Simmonds, Mark  
**Sent:** 03 January 2017 18:02  
**To:** 'Simon Sharp'  
**Subject:** RE: 170103 BRA144 Tongue End AD

Dear Simon,

Thank you for the information.

Kind regards,

Mark

Mark Simmonds | Planning Officer | South Holland District Council  
DDI: 01775 764502 | [www.sholland.gov.uk](http://www.sholland.gov.uk)

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**From:** Simon Sharp [<mailto:simonsharp@jhwalter.co.uk>]  
**Sent:** 03 January 2017 17:48  
**To:** Simmonds, Mark  
**Subject:** 170103 BRA144 Tongue End AD

**This message originated from outside your organization**

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Dear Mark,

Thank you for your emails. My comments are in blue italics below. In terms of your other query in relation to average per hour movements, I think your assumptions are reasonable.

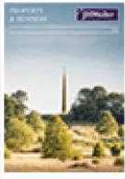
Kind regards

Simon

**Simon J Sharp** BA (Hons) BSc (Hons) DipTP MRTPI  
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**From:** Simmonds, Mark [<mailto:marksimmonds@sholland.gov.uk>]

**Sent:** 03 January 2017 10:18

**To:** Simon Sharp <[simonsharp@jhwalter.co.uk](mailto:simonsharp@jhwalter.co.uk)>

**Subject:** ADP

Hi Simon,

FYI – below is full list of questions from Members.

If you could skim read and comment if you think there are any key points would be very kind.

Thank you

Mark

Mark Simmonds | Planning Officer | South Holland District Council  
DDI: 01775 764502 | [www.sholland.gov.uk](http://www.sholland.gov.uk)

A plan showing the entire acreage of land farmed by Branton Farms.

*The holding extends to approximately 2,000 ha. We have previously provided the plan of the nearest 500 ha. Please also see our response below in relation to land used.*

The position and alignment of the gas pipe line into which the gas is to be injected.

*This is just to the north of Counter Drain Drove but south of the River Glen.*

The location of the site related to DSN appears incorrect. The report says north of DSN and south of Tongue End . Shouldn't it be North East of DSN and North/ North East of Tongue End?

*We consider it is to the southeast of the nearest dwellings of Tongue End and to north and northwest of DSN.*

Explanation of digestate being spread across the whole year. Does that mean some land will be left fallow reducing the area available for growing feedstock resulting in outside land being required.

*Digestate is not spread all year. Spreading of digestate is limited by NVZ closed periods. The transportation movements represent movements of the digestate both to fields for spreading (when allowed by NVZ regulations) and movement to offsite satellite lagoons.*

Does the transportation numbers include the transport to satellite locations and the distribution to be spread.

*Yes see comment above*

Has consideration been given to the visual impact of tractors / loaders moving on top of the silos when loading and compacting the feedstock.

*These movements are very infrequent and part of normal farming practices*

Is there any evidence that the same area of land can continuously be used to produce the same crops. Also is there any evidence that the area specified can produce the tonnage required.



*We acknowledge that the same fields will not be used continuously over the lifetime of the AD plant and break crops will be required periodically. However, as already stated in our submitted documents, the land within the applicant's control is appropriate for the quoted tonnage (based on average yields for both these crops from other clients growing for AD, these crops have the following yields per hectare per annum - Maize = 45 tonnes, Rye = 40 tonnes). We acknowledge that the maps show 500 hectares of land and this represents the nearest fields. Feed crop from land within the holding beyond these fields to the south (not adjacent to Tongue End) may be used but will be transported via the yard as per the previously submitted current transport statement. Specifically the TS takes account of these movements from the south (not via Tongue End).*

How can the location be described as central to the fields producing the feedstock when the majority is on the other side of North Drove. There appears to be a more sensitive site within that parcel of land!  
*Please refer to answer below.*

How has the present site been arrived at. Has sequential test been applied or is it merely more convenient for gas connection? What other sites were considered and why were they rejected?  
*There are a combination of factors that determined the location of the proposal.:-*

- 1. Proximity to gas pipeline (additional length of connection pipeline increases costs substantially affecting deliverability)*
- 2. Being an appropriate distance from dwellings not in the applicant's control.*
- 3. Proximity to adopted highway for sugar beet pulp deliveries (to minimise the length of improved private road required to ensure viability of project)*
- 4. Minimising distance from feedstock fields*
- 5. Minimising flood risk*
- 6. Not affecting significance of heritage assets and sites of wildlife value.*
- 7. Using land already occupied by a building.*

*Taking all of these considerations into account results in the site being identified. Moving further south affects points 1, 3, 6 and 7.*

2.14 seems to be at odds with 2.6 which states that there is no combustion process but 2.14 talks of gas burners.  
*The gas burners will be used in the event that the grid is unavailable for gas injection. This will be minimised as no income can be derived from burning off the gas; it is not in the interests of applicant. To assure safety the burners are tested briefly once per month.*

Is 2.18 correct in the location of planting?

*As per current proposed plan, the whole site will be bounded with planting of local species also surrounding the entire site to minimise visual impact.*

2.22 whilst it is stated that no more journeys would be created surely the return would be over a different route?  
*The returning HGV's would usually go to Willow Tree Farm located at the northern end of Deeping St Nicholas. Instead they will travel to the site via Counter Drain Drove coming east from Podge Hole to site, they will then return via this route to Willow Tree Farm to collect further Beet for transportation to Wigginton. The routes used will be the same with only the returning location slightly extended. Given that the deliveries are from Wigginton it is reasonable to assume that the HGVs will not come from the west (via Baston and Tongue End). However, to ensure they do not, the s106 will be in place.*

Can all of the quantity of waste beet material be transported as back loads by the applicants own transport or will additional journeys be required?

*Backloading will provide sufficient sugar beet without the need for additional journeys*

Is it intended to enforce vermin control?

*As previously advised suitable vermin control will be included*

Has the effect of unprecedented rainfall been taken into consideration in containing contaminated water on site.  
*The drainage strategy is designed up to and including 1 in 100 year events plus a 30% allowance for climate change*

7.2.6. This must be a subjective opinion and equally capable of a different conclusion. The NCA appears to be at odds with this conclusion, explain. 7.3.4 would seem to confirm this.

*We obviously disagree with the visual impact conclusions but you are right to apply its planning balance and, in this regard, even with your conclusions, we concur with the overall balance and weight afforded to the sustainability benefits etc.*

7.4.3 how can this be enforced. It appears to be window dressing unless it can be monitored and enforced in the event of non compliance.

*Legally enforced through 106, enforceable as SHDC officer has sight of site entrance from public highway adjacent to Tongue End (they can identify from this vantage point if traffic movements associated with the site have passed through Tongue End).*

Explain white noise reversing alarms.

*I presume this doesn't need a response.*

Condition 14 Is this time limited or is it possible to avoid the limitation of ten years quoted in condition 21.

*We would accept the same 10 year minimum commitment to be added to condition 14.*

Will any property be affected by "planning blight" at any stage following consideration of the application and if so who will be responsible for compensation?

*Not a planning consideration*

Please expand on the reasons why an EIA is not required.

*I would refer to the SO*

Does the Secretary of State have any involvement should the committee decide to refuse the application or does the usual appeal process follow. If that were to be the case what is the likelihood of an inspector accepting all of the proposed conditions should the appeal be successful?

*It is at the SOS's discretion if they require the application to be referred to them as to whether they accept the suggested conditions.*