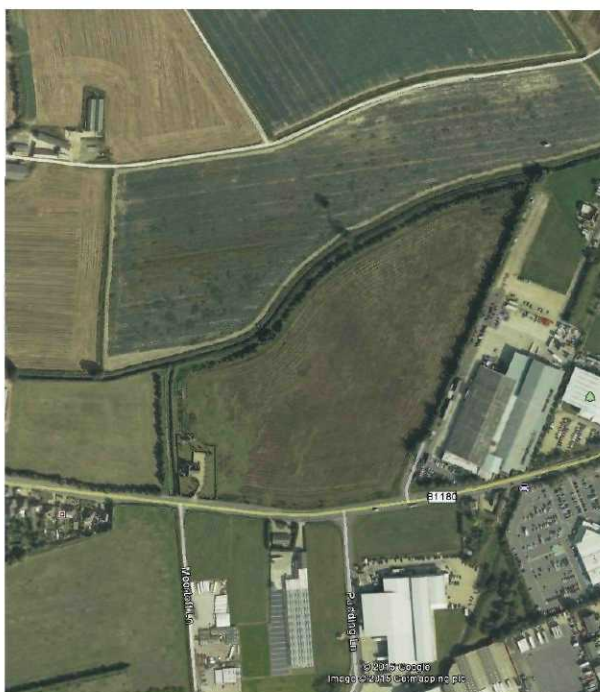


FULL PLANNING APPLICATION

Planning, Design and Access Statement



(Courtesy of Google Earth)

Land to the north of the B1180 (Wardentree Lane), Pinchbeck

Prepared by JHWalter LLP on behalf of
ET Biogas Ventures Ltd

July 2015



Planning, Design and Access Statement

Land to the north of the B1180 (Warden Tree Lane),
Pinchbeck

Client: ET Biogas Ventures Ltd
File Reference: L/ENV/005

Author:
**John Morrison BA (Hons) MSc
MRTPI**

Position: Senior Planning
Consultant

Signature:

Date: 02 July 2015

Edited and Checked by:
**David Wright BSc (Hons) MIAgrM
MBIAC**

Position: Managing Partner

Signature:

Date: 02 July 2015

Status: FINAL

Date: 02 July 2015

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1.0 Introduction

- 1.1 This supporting statement has been prepared by JHWalter LLP (the agent) on behalf of ET Biogas Ventures Ltd (the applicant) to accompany and support a full planning application for the **'erection of an anaerobic digestion plant'** on land to the north of the B1180, Walden Tree Industrial Estate, Pinchbeck. JHWalter have been involved with Anaerobic Digestion (AD) projects for over seven years including food industry, farming and industrial based systems.
- 1.2 The consolidated Town and Country Planning (Development Management Procedure) (England) Order 2015 states that major development means, inter alia, waste development. As a major application therefore, the proposals are supported by a Design and Access Statement.
- 1.3 Expanding this requirement further, and owing to the varied nature of the potential impact of the development, this document will also serve to discuss the site and its location, outline the proposal, evaluate the development in terms of national and local planning policy and provide an overall conclusion.
- 1.4 The following drawings are submitted in support of the application:

Drawing Number	Description
19597-101 Rev B	Site Location Plan
19597-102 Rev B	Proposed Site Plan
19597-003 Rev G	Proposed Site Layout
19597-005 Rev C	Proposed Site Sections
19597-020 Rev 0	Technical Building Floor Plans and Elevations
19597-021 Rev 0	Gas Upgrading System Floor Plans and Elevations
19597-022 Rev 0	Combined Heat and Power Unit Floor Plans and Elevations
19597-023 Rev 0	Gas Entry Unit Floor Plans and Elevations

2.0 Site Analysis and Description

- 2.1 The proposal site is located to the north of the B1180 and is the corner of an existing agricultural field accessed from the road via a field gate. The wider field is relatively flat and triangular in shape, tapering to a point to the northeast. The field directly abuts the western fringes of the Warden Tree Industrial Estate which links Pinchbeck to the A16.
- 2.2 There is a dyke running to the north of the field which also has some semi mature planting to the boundaries. The field is quite separate to the surrounding land. The wider area is characterised by commercial uses and large scale employment development associated with B1, B2 and B8 uses. As such the surrounding built form is utilitarian in design and pre-fabricated structures are a common feature. There are also some processing uses that form part of the wider estate that feature other strong and more vertical built features.
- 2.3 The nearest residential dwellings to the proposal site, as the crow flies, are to the southwest and also immediately opposite the southern boundary of the field, facing north towards the road.
- 2.4 The application site is on land currently in agricultural use and covers approximately 3.2 hectares. The proposals involve the sharing of an existing access from Warden Tree Lane. The access is for a large food preparation site and thus is purposely designed for the operation and reception of HGVs from the public highway.
- 2.5 Whilst the proposals are submitted to Lincolnshire County Council owing to the waste feed element, they fall within the administrative district of South Holland District Council. The general character of the immediate area is referred to above, and as the site is outside of an existing built up area or defined settlement, it is considered open countryside for the purposes of planning policy. The site is not in the Green Belt.
- 2.6 According to the Environment Agency's flood risk maps, the site falls within flood zone 3. In addition with the site being over 1 hectare a Flood Risk Assessment (FRA) has been completed and is duly included with this application. Matters of the sequential and exception tests as set out by national guidance are addressed later in this statement.

3.0 The Proposal

- 3.1 The application proposal seeks full planning permission for the **'erection of an anaerobic digestion plant'** (hereafter 'the AD plant/unit') for ET Biogas Ventures Ltd.
- 3.2 The proposed plant will supply bio methane to both the national grid network and a proposed bio gas vehicle filling station. The site has been selected for its proximity to an existing gas grid connection and commercial/industrial setting. The site is also central to the proposed feedstock area as well as placed within a cluster of large scale HGV operators who would potentially be able to utilise the bio fuel.
- 3.3 The project will seek to produce biomethane that is produced from a combination of energy crop and a proportion of waste from the food processing industry. As well as the production of gas as a valuable source of fuel, the other output from the process is digestate; a naturally produced organic fertiliser that is recognised by DEFRA and other organisations as a safe and environmentally friendly fertiliser to be recycled back to the land to promote the growth of future crops. This is another major driver for the AD plant as the production of this bio-fertiliser will reduce the dependency of food producers on mineral fertiliser as well as improving overall soil fertility.
- 3.4 Following the decision to progress the proposal for the site, the objective is to have the plant built and commissioned by the end of 2015/beginning of 2016.

Process Overview

- 3.5 Energy crop feedstock will be produced from land farmed locally. The map shown at appendix 3 identifies this area. Waste from the food preparation industry will be sourced from local businesses also within this area. As an approximate guide, the energy crop will amount to in the region of 80%, and the waste material 20%.
- 3.6 The silage feedstock is harvested in May to July and maize in September/October and beet from September to February. Cultivating and harvesting operations will vary depending on the crop but these activities will be complimentary to existing farming operations.
- 3.7 The material will be ensiled on the farm prior to being fed into the digestion system and is supplied from neighbouring farms. Daily journeys are a combination of crop

and waste feed. Further details of traffic movements are expanded on later in this statement.

- 3.8 Solid feedstock is loaded into a hopper and from there conveyed into the pre-mixing vessel (dissolver). Additionally liquids are added and subsequently the mixture is stirred and mascerated, before being pumped into the digester. Through the pre-mixing vessel all feedstocks can be weighed and recorded in order to have a precise and accurate feeding mixture.
- 3.9 The digester is an insulated concrete tank, covered by a double membrane roof which provides temporary storage for the biogas. The biogas is produced through the anaerobic digestion of organic matter, contained in the feedstock. This anaerobic digestion process takes place at a temperature of around 37° C. This temperature is required to maintain the activity of the bacteria inside the digester.
- 3.10 Within each digester, 4-5 agitators are installed to stir all the digestate ensuring an efficient and stable digestion process. After digestion, the processed digestate is stored in the gas-tight digestate storage tank.
- 3.11 The digestate is then applied back to the land as an organic fertiliser, saving mineral fertiliser use and reducing CO2 emissions created by the production of chemical fertiliser. There is therefore no residual waste within the whole lifecycle of the plant's operation.
- 3.12 The proposal relates to the following structures, which are identified on the accompanying drawings.

Structure	Dimensions	Description
Feed hopper	2x240 cubic metres	Erected inside the process building as shown, partly sunk into the ground connected via an auger system to the mixing vessels
Liquid storage tank (x4)	4x100 cubic metre liquid storage tanks. 14-15 metres high, 3.5 metre diameter	Holding liquid organic material, to be mixed with the solid feedstock

Structure	Dimensions	Description
Digester tanks (x3)	6700 cubic metres, 35.9 metre diameter tank, gas holder to top of tank, total height of 16.3 metres above ground level	Each digester fed separately with double membrane roof under constant pressure with inner layer storing the gas
Digestate Storage Tank (x1)	7100 cubic metres, covered with double membrane roof	Holds sufficient capacity for 74 days by means of tank, additional storage afforded by offsite lagoons at farms from which feedstock is sourced
CHP Units (x1)	See submitted plans for dimensions of proposed 499kW generating unit, to be containerised.	Provides the required amount of heat for heating the digesters, pasteurisation process and also provides electricity for plant operation
Technical Building	See submitted plans for dimensions of proposed technical building which will house feedstock loading, handling and preparation prior to digestion entry	Building will be designed with a negative pressure system and equipped with air treatment system (biofilter) to control odours. Building also contains, offices, welfare facilities, control panel room, work space (for maintenance) and the pasteurisation system
Sub Station	4m wide by 4m pad on which standard Western Power Distribution. GRP housing anticipated to be installed.	To provide import and export facility

Structure	Dimensions	Description
Separator	Located on the north side of the site	To produce both liquid and solid bio fertiliser which can be reapplied to land on a daily/weekly schedule.
Biogas Fuel Station	See site cross sections	Overground pump equipment for vehicle fuelling.
Storage Lagoons (x2)	See plans for dimensions of surface water lagoons	For purpose of storing and using surface water runoff from the site and not for the storage of digestate

4.0 Planning Policy Considerations

The National Planning Policy Framework (NPPF)

- 4.1 At the heart of the NPPF is a presumption in favour of 'sustainable development'. Paragraph 14 states that, *'for decision-taking this means approving development proposals that accord with the development plan without delay.'* Paragraph 19 goes on to indicate that, *'Planning should operate to encourage and not act as an impediment to sustainable growth.'* Therefore significant weight should be placed on the need to support economic growth through the planning system.'
- 4.2 The NPPF does not change the statutory status of the Development Plan as this has primacy. However, the NPPF constitutes Government guidance for local planning authorities and is a material consideration of some weight in determining applications.
- 4.3 Paragraph 17 of the NPPF outlines a set of twelve core land use planning principles which should underpin both plan making and decision taking. One of which states that planning should *'support the transition to a low carbon future in a changing climate....and encourage the use of renewable resources (for example, by the development of renewable energy).'*
- 4.4 In meeting the challenge of climate change, the NPPF recognises the role that planning can play in helping shape places to secure radical reductions in greenhouse

gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. The NPPF supports the delivery of renewable and low carbon energy and acknowledges that it is '*central to the economic, social and environmental dimensions of sustainable development*' (Paragraph 93).

- 4.5 Local Planning Authorities are asked to support the move to a low carbon future and have a positive strategy to promote energy from renewable and low carbon sources. They should '*design their policies to maximise renewable and low carbon energy development, while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts*' (Paragraph 97).
- 4.6 When determining planning applications, the NPPF states that planning applications for renewable energy development should be approved¹ if its impacts are, or can be made acceptable. As was the case with Planning Policy Statement: Planning and Climate Change – A Supplement to PPS1, which the NPPF replaced, Local Planning Authorities should not require applicants for renewable energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.
- 4.7 The NPPF is clear on the assessment of the impact of development proposals on heritage both built and natural, stating that great weight should be given to the conservation of heritage assets and the more important said asset, the greater weight should be afforded. The NPPF makes clear that significance can be harmed through alteration or destruction of the asset or its setting.

National Planning Practice Guidance (NPPG)

- 4.8 Having gone live as an online interface in March 2014, NPPG intended to set out the way in which the application of broad planning policy subject matters are interpreted and replaces the former, and in some cases outdated, system of government circulars. Their status as a material consideration is deemed to carry weight alongside the objectives set out by the NPPF.
- 4.9 NPPG also develops additional detail behind the flood risk sequential test as established by the NPPF in terms of development in areas at risk of flooding, setting out the 'areas' at risk of flooding and that how flood risk planning is relevant at a strategic level in the formulation of development plans. It reiterates that the test is in

¹ Unless material considerations indicate otherwise

part a risk based approach to assessing land for development in areas at risk of flooding and that development is safely and sustainably delivered. NPPG follows the lead of the NPPF in this regard.

- 4.10 NPPG advises pragmatism when considering the application of the Sequential Test (ST) and accepts that whilst it is still a duty placed on LPA's to direct development away from those areas at highest risk of flooding towards those at lesser risk, there may be situations where other factors outweigh negative consideration for development in an area at higher risk such as other wider sustainability benefits.

Climate Change

- 4.11 Climate Change refers to changes in the earth's temperature, and is one of the most significant issues facing the planet today. Over the last 100 years or so the average near-surface temperature of the planet has increased by 0.75 degrees Celsius and the UK's sea level has risen by approximately 10cm (DirectGov²). The effects of climate change include rising temperatures, higher sea levels and more frequent extreme weather events such as floods.
- 4.12 There is very strong evidence that climate change cannot be explained solely by natural causes, and human actions, especially those that emit greenhouse gases such as carbon dioxide, are causing the atmosphere of the earth to warm (DirectGov). At present over 30 billion tonnes of CO₂ are emitted globally each year by burning fossil fuels (DECC³).
- 4.13 Governments around the world have signed up to numerous agreements in order to tackle climate change. Specifically in the UK, the Climate Change Act 2008 set legally binding emission reduction targets of 34 percent in greenhouse gas emissions by 2020 and a reduction of at least 80 percent in greenhouse gas emissions by 2050 (DECC). In the same year the Department of Energy and Climate Change was created to bring together energy policy and climate change mitigation policy and take the lead in tackling the challenges we face.

Renewable Energy

- 4.14 Renewable energy has a vital part to play in reducing greenhouse gas emissions and meeting the targets set out in the Climate Change Act 2008. The Renewable Energy Strategy (2009) sets out how the use of renewable energy can be used to tackle

² DirectGov, Climate Change: a quick guide

http://www.direct.gov.uk/en/Environmentandgreenerliving/TheWiderEnvironment/Climatechange/DG_072885

³ Department of Energy & Climate Change, What is climate change?

http://www.decc.gov.uk/en/content/cms/what_we_do/change_energy/what_is_cc/what_is_cc.aspx

climate change and help secure future energy supplies. It details how the UK can meet the legally-binding target to ensure that 15% of our energy comes from renewable sources by 2020, which was set in the EU Renewable Energy Directive.

- 4.15 The Renewable Energy Strategy (2009) highlights the role of renewables in meeting energy and climate change goals.

Sustainable Development

- 4.16 Sustainable development is about balancing our economic, social and environmental goals. Meeting the renewable energy targets is not just about environmental sustainability by preventing climate change and securing future energy supplies. Achieving the targets could provide £100 billion worth of investment opportunities and up to half a million jobs in the renewable energy sector by 2020 (DECC).

National Guidance: Discussion

- 4.17 The current application clearly accords with the NPPF as it is a truly **sustainable development**. The development has been proposed in order to **promote the use of renewable energy resources** and **support the transition to a low carbon future**.
- 4.18 This project aims to work towards the DECC commitment for a reduction in greenhouse gas emissions which will help the government to meet its targets for both carbon emission reduction and renewable energy production. The importance and worth of this single project should therefore not be underestimated.
- 4.19 An Ofgem report in October 2012 indicated that Britain risked running out of energy generating capacity in the winter of 2015-16 and the amount of spare capacity could fall from 14% to just 4% in three years. Alistair Buchanan, Chief Executive of Ofgem said that more investment was needed in building fresh generating capacity.
- 4.20 Due to such potential issues the Government has long been seeking the development of local distribution grids, especially where it is supplied by low carbon and renewable resources. The proposal would provide a local renewable and low carbon energy supply; provide increased capacity in the area as well as reducing loss through transmission. The importance of this should not be under estimated.
- 4.21 In relation to environmental and social impacts, it is deemed that due to the location, design and scale of the proposed AD unit any impacts will be avoided or minimised (see Section 5).

- 4.22 At a local level the project will help support farming business and sustain employment as well as establishing local business linkages and mutual economic support. The investment in the proposal will also contribute to the wider economy during the plants procurement, its construction and its ongoing maintenance. Through digestion of local organic waste, biomethane will be produced and fed into the local grid for local use as well as being provided on site for use as a bio fuel, directly providing to local operators.

Local Planning Policy – The Development Plan

- 4.23 Lincolnshire County Council (LCC) is currently consulting on its draft Core Strategy and Development Management Policies document. It is anticipated that these documents will ultimately replace the 2006 Waste Local Plan and the 1991 Minerals Local Plan. As unadopted documents they attract weight as the emerging Development Plan only (material considerations). However, for the purposes of decision making and primacy, the 1991 and 2006 plans should be afforded the greater weight.
- 4.24 Whilst the application is submitted to LCC as the determining authority for development including waste management, the proposal site is within the administrative district of South Holland (SHDC). SHDC, like LCC, are currently compiling their evidence base for the adoption of a new local plan to replace their current 2006 plan. Their new plan is emerging and as such the 2006 adopted plan remains the Development Plan for decision making purposes. In this plan, the proposal site falls within an area allocated for employment development.
- 4.25 This section of the statement aims to set out how the proposals sit with the adopted Development Plan as well as touching on the general thrust of the emerging plan. The Council appear to be working towards their adoption following examination later in 2015.
- 4.26 The 2006 Waste Local Plan now remains as a set of adopted Policies saved in 2009. Specific to the proposals is saved Policy WLP11 which addresses Anaerobic Digestion (AD) and mechanical biological treatment.
- 4.27 The WLP sets out that the county is the largest in the region, covering some 592,000 hectares, is predominantly rural with roughly 70% of its population living in settlements of over 2,000 people. As at the 2011 census, the county's population stood at just over 1,000,000.

- 4.28 The WLP also discusses the compilation of the Joint Municipal Waste Management Strategy (JMWMS) in partnership with the seven district authorities. The JMWMS guides the management of household waste collection and disposal and identifies the technology and services required to meet European Union and Government targets relating to composting, recycling and the recovery of value from waste and for the reduction on the reliance of landfill as the main method of waste management. The JMWMS and the WLP are complementary documents which provide a strategic basis for waste management in Lincolnshire.
- 4.29 Saved Policy WLP11 confirms that AD is the process of degrading organic matter in the absence of oxygen; producing bio gas which can be used to manufacture fuel or generate electricity. The policy recognises that the process has a well-established track record, given also that the material left over after the process is a useful fertiliser product.
- 4.30 The policy agrees that the longer term opportunity for such plants exists in partnership with the food and agricultural industry as well as proposals to manage other forms of commercial waste.
- 4.31 For saved Policy WLP11, the key planning issues to consider with regards AD proposals would be:
- Traffic
 - Air Emissions
 - Visual Impact
 - Odour
 - Noise
 - Leachate
- 4.32 With respect to the above, they follow a positively worded policy that has a presumption in favour of the development in principle but sets out that much of the impact will depend on the scale and location of the proposals, the amount of journeys and type of vehicles that such would attract, design, heritage, amenity nuisance (noise and odour), proposals to deal with the end product and safeguards against pollution of the ground water.
- 4.33 The policy sets out proposals for mitigation in terms of the key areas of impact suggesting that deliveries to facilities should be routed away from inappropriate roads thus influencing location. In terms of air emissions, policy rightly echoes the

statements made in this report which is that as the process relies on the absence of oxygen emissions, such odours are controlled.

- 4.34 With regards to reducing the visual impact of proposals, policy suggests that where possible proposals should be located close to or within a site comprising existing development. Policy recognises that as plants tend to include tanks one could argue for similar utilitarian design and appearance in a plant's construction. There is also recognition, that due to the enclosed nature of the AD process, noise and odour tend to be minimised. Policy also seeks sensitive siting and good plant management. Leachate control methods are explored such as bunding in accordance with Environment Agency (EA) regulations.
- 4.35 In terms of setting out how the proposals sit with the both the supporting and measurable impact elements of policy, this report refers to the technical assessment section which sets out the likely impact of the proposals in respect of noise and odour, traffic and transport, heritage, landscape, visual effects and ecology.
- 4.36 In terms of the principle of the proposals, the Council considers the concept acceptable subject to an understanding of the impacts which the following technical assessment will expand on.
- 4.37 The emerging draft Core Strategy and Development Management Policies document (CS) is currently out for public consultation. It forms the strategic direction for the Council and would be adopted post the National Planning Policy Framework (NPPF). The Council have not set a deadline for adoption of the emerging documents as they are carrying out further consultations on public responses throughout the spring of 2015. The CS does nevertheless carry some weight as emerging policy.
- 4.38 Policy DM1 of the CS reiterates the clear and emphatic stance of the NPPF in the strong presumption in favour of sustainable development. It states that the Council will take a positive approach to development that reflects this commitment.
- 4.39 Policy DM2 acknowledges the role that proposals for development play in combatting climate change and commits to reducing reliance on landfill and identify good quality sites for the generation of renewable energy. The policy suggests that the key considerations of such remain the site specific impacts and development proposals should take full account thereof. These include residential amenity, ecology, pollution control, the highway network and air safety.

- 4.40 Policy DM3 continues this by setting out that planning permission will be granted for development provided that it does not generate unacceptable adverse impacts arising from noise, dust, vibration, odour, emissions, illumination, visual intrusion run off and traffic.
- 4.41 Policy DM4 addresses the historic environment, stating that development proposals will be granted planning permission subject to ensuring that heritage assets, and their settings, are conserved and where possible enhanced. The policy also addresses seeking alternative sites where there may be an impact and whether there are any exceptional or overriding reasons that clearly outweigh the need to safeguard the value of sites.
- 4.42 Policy DM6 sets out the consideration of development in the context of landscape and townscape and suggests that due consideration should be given to the distinctive character of the landscape of the county and assess where appropriate design and landscaping should be used.
- 4.43 Policies DM7-DM9 pickup on the importance of assessing the impact of a given development on areas of both national and local areas of ecology and biodiversity value. They highlight that development will only be approved if it can be demonstrated that the merits of any development outweigh the likely impact and that any adverse impacts are clearly compensated for. Policy also legislates for the loss of the best and most versatile agricultural land.
- 4.44 In terms of traffic and transport, Policy DM14 advises that where proposals involve development that is accessed by road, the network is suitable for the traffic generated by the development and that arrangements for access will not impinge highway safety or the safe and free flow of traffic around the site.
- 4.45 Policy DM15 reiterates the sequential approach set out by the NPPF and states that proposals need to be located on land at the lowest possible risk of flooding where possible and will need to demonstrate that site can be developed without increasing the risk of flooding elsewhere. Similarly, the impact of any development on water quality and resource is also safeguarded by the provisions of Policy DM16.

The Development Plan: Discussion

- 4.46 In order for the proposals to sit squarely with the development plan, they will need to satisfy the requirements to minimise increases in ambient noise levels; minimise

impact on visual or residential amenity through appropriate siting, layout, design and landscaping. This will also extend to heritage built, natural and archaeological.

- 4.47 The land is classified as Grade 1 and as such it is important to balance the loss of such alongside the benefits of the proposals as renewable energy development.
- 4.48 The land take overall, in the context of the extent of land available at this grade is small. In addition, there is no other land available for the development of the proposal at a grade which is of lower quality than the application site and which is within as optimum a distance from the proposed feedstock as the proposal site. Applying the principles of sequential site assessment and sustainability in the spatial sense therefore the site is considered appropriate for the proposed development taking into account also the bio fuel supply element, the availability of feedstock and the proximity to a gas grid connection of available capacity and correct pressure.
- 4.49 The site has a main road access and is part of a semi industrial/commercial setting.
- 4.50 This application represents a compelling case for sustainable development. The environment and economic benefits of the scheme are considered to far outweigh the environmental and visual impacts.
- 4.51 Both national guidance and the Development Plan set out a strategic commitment to tackle the causes and effects of climate change and deliver a reduction in the District's overall CO² emissions. There is encouragement for the provision of renewable and low carbon energy generation within new development. It is advanced therefore that the proposals fit in with the thrust of the Council's strategic aims with regards reducing CO² emissions.
- 4.52 There are, as this planning application supporting statement suggests, socio economic benefits to the installation of the plant. Whilst the primary aim of the proposals is to seek a reduction in the local and national reliance placed on non renewable energy resource and the establishment of a distributed energy production grid, other direct benefits are achieved.
- 4.53 The proposals have, contextually, a small land take and are proposed directly adjacent to high quality highway infrastructure. There are existing buildings immediately adjacent the proposed plant and the area is developed around a hub of what has historically been land allocated for industrial and employment development. The proposals do not spread outside of the general envelope of these features and as such, notwithstanding the development being appropriate, it would be difficult to

reconcile an argument to suggest that they would harm the open character of the countryside although this is assessed in more detail below.

5.0 Technical Assessment

- 5.1 Anaerobic digestion is a technical process yet, at the same time, is a relatively simple biological concept. This statement earlier provided a process overview and this section will now provide an assessment of the impact of relevant technical aspects relating to the development of this plant to this specific location. This section will also seek to expand on how the proposals sit with the focus and direction of the policies set out by the Development Plan.

Landscape and Visual

- 5.2 The proposals will be located within a field adjacent to an existing industrial estate. The location and design of the AD plant has been carefully considered to have minimal landscape and visual impact. The site has been sympathetically located next to existing industrial buildings and the landscape character has been thoroughly analysed when considering the location of the plant. The site has been selected to assimilate the development into its immediate and wider surroundings, while respecting that landscape character.
- 5.3 In a local context, the determining authority (Lincolnshire County Council, LCC) have not produced a county specific Landscape Character Assessment (LCA). In a local context, no similar such work has been undertaken by South Holland District Council (SHDC) that might assist with providing a base line for an assessment of the landscape and visual impact of the proposals. Natural England's National Character Area (NCA) profiles do however provide some context albeit more on a sub-regional level and not specifically local to the site. Still, the relevant characteristics of the various areas will be useful in determining the landscape context of these proposals and how they might have an impact.
- 5.4 This proposal falls within NCA profile 46 (NE424 The Fens). The NCA is considered as being a distinctive, historic and human influenced wetland landscape which lies to the west of the Wash Estuary. The area is notable for its large-scale, flat, open landscape with extensive vistas to level horizons. The level, open topography shapes the impression of huge skies which convey a strong sense of place, tranquility and inspiration.

- 5.5 It is a large, low-lying, flat landscape with many drainage ditches, dykes and rivers that slowly drain towards the Wash, England's largest tidal estuary. The single obvious factor uniting the Fens is the low-lying, level terrain reflecting its geological past. With the exception of the Isle of Ely, which reaches above 20 m, elevations rarely pass the 10 m contour, and typically vary by little more than one or two metres over long distances.
- 5.6 Much of the land is below sea level, relying on pumped drainage and the control of sluices at high and low tides to maintain its agricultural viability. The level horizons and the huge scale of the landscape create a strong sense of isolation and tranquility, and a distinctive sense of place. There are, typically, large open panoramas and enormous skies, whose changing weather patterns have a strong influence on the observer.
- 5.7 Overall, woodland cover is sparse, notably a few small woodland blocks, occasional avenues alongside roads, isolated field trees and shelterbelts of poplar, willow and occasionally leylandii hedges around farmsteads. The predominant land use evidently is agriculture and associated horticultural glasshouses are a significant built feature of the NCA.
- 5.8 Open fields, bounded by a network of drains and the distinctive hierarchy of rivers (some embanked), have a strong influence on the geometric/rectilinear landscape pattern. The structures create local enclosure and a slightly raised landform, which is mirrored in the road network that largely follows the edges of the system of large fields.
- 5.9 Large, built structures exhibit a strong vertical visual influence, such as the 83 m-high octagonal tower of 'Boston Stump' (St Botolph's Church), wind farms and other modern large-scale industrial and agricultural buildings, while drainage and flood storage structures and embanked rail and road routes interrupt the horizontal fen plain
- 5.10 Settlements and isolated farmsteads are mostly located on the modestly elevated 'geological islands' and the low, sinuous roddon banks (infilled ancient watercourses within fens). Elsewhere, villages tend to be dispersed ribbon settlements along the main arterial routes through the settled fens.
- 5.11 Traditional boundaries in this NCA are drainage ditches and dykes which form key landscape elements. Hedgerows tend to be located on clay islands and areas of infrequently 'enclosed' pockets of inland Fenland, but these historic patterns have been weakened due to housing development and limited management.

- 5.12 It is noted that wind energy schemes have created visual landmarks in this predominantly flat landscape and accordingly played a part in reducing the sense of remoteness and isolation. The study advises that future development should be sited away from visually prominent locations. It however recognises that the Government's commitment to increasing energy from renewable sources means there is likely to be continued pressure to accommodate such schemes. The study also highlights the importance of hedgerow reinstatement and continuing to monitor the spread of housing development beyond existing limits.
- 5.13 The study advises that development should seek to protect the long views and open expansive unwooded character of the landscape and work to visually mitigate the impact of large structures including unsympathetic buildings and energy infrastructure that are highly visible in this flat landscape.
- 5.14 Views of the development are available from the immediate area but are mostly transient. They are limited in some respects locally by interrupting development. Thus the immediate impact of the development is negligible in wider landscape character terms.
- 5.15 As part of a more detailed visual impact assessment and how the proposals may sit in what is clearly a wide and expansive landscape, key views were taken from pre-selected points which sought to take account of topography and local features and thus set out indicatively the magnitude of the likely impact. The photographs associated with these views as well as a map showing their location and relative direction can be found at appendix 1 to this statement as well as a series of photomontage visualisations.
- 5.16 When assessed in a much wider setting, the proposals do not offer more than local views given that the site abuts an industrial estate to the east and is a short distance west of the larger urban area of Pinchbeck. The extent of the development at Pinchbeck which is almost in its entirety situated to the west of the B1356, will almost certainly shield any views of the proposals from further west.
- 5.17 This statement has selected viewpoints from where the proposals are likely to be seen in their wider setting. A total of five fixed points were selected between 0.3km and 1.5km from the site at points to the north east and north west, south, west and south west. The viewpoints were selected where the more characteristic open landscape may offer clear views and consequently allow appreciation of the proposals in their context.

- 5.18 **Viewpoint 1** is taken from the existing entrance to the site as it runs north from Warden Tree Lane. There will be a clear view of the site and principally the tanks to the right of the view in the corner of the field. Given the tree planting to the site boundaries it would be difficult to contend that the proposals specifically blocked any view that still cannot be appreciated from further down Warden Tree Lane to the west of the proposals and also where the more open landscape to the north can be accessed via the local public rights of way network.
- 5.19 **Viewpoint 2** is taken from the nearest public footpath to the application site as well as within 50m of the nearest listed building Grade II Otway House (further details of this are included in the heritage assessment below). From here the treeline along the northern side of the field can be easily identified but there are no clear views of the application site itself. The treeline is sufficient that even with the height of the development clear views would be limited.
- 5.20 **Viewpoint 3** is taken from the south west, just off the B1356 (Spalding Road). This view allows an appreciation of the likely impact on the back gardens and east facing windows of the residential dwellings along Spalding Road. The dwelling that is located in the corner of the field closest to the proposals can be identified however the angle obscures the industrial estate that lies adjacent to the application site. As the development itself will be less sprawling than the buildings that make up the industrial estate it is clear that the impact from here will be limited.
- 5.21 **Viewpoint 4** is taken to the northwest of the site and gives an impression of the likely impact and appreciation of the proposals from a distance and across the characteristic flat landscape. This viewpoint will offer views of the higher elements of the development but read against both tree lined field boundaries between the viewpoint and the site as well as the built form to the south of the proposal site.
- 5.22 **Viewpoint 5** is taken from the A16 which is a transient view and distance influences the magnitude of the impact from this point. In the same way as viewpoint 4, the site will be appreciated in the context of the industrial estate given its overall scale. The 'gap' that exists between the current edge of the estate and the built extremities of Pinchbeck is not particularly characterful. As such no significant adverse impact is considered to arise.
- 5.23 Whilst there are some relatively strong vertical features in the proposals these are not dissimilar to elements of the adjoining industrial estate. There are no clear isolated views of the proposals and from most angles and distance there is clear built context which minimises any adverse landscape or visual impact.

- 5.24 There is no alteration to the historical field pattern and only a small increase in the field entrance is required alongside the existing access from the highway. Earlier comments made concerning the built back drop of the proposals also play a significant part in understanding the wider impact of the proposals in the sense of the landscape character that makes up the intrinsic beauty of the wider countryside.
- 5.25 This proposal suggest that any additional planting will be in accordance with the local native species guide or matching what is currently on site. Further details of such can be provided on request. In addition, the materials used for the tanks are proposed to be dark green with a grey roof so it will blend in with the agricultural background.
- 5.26 In summary, the size and nature of the plant is essentially agricultural, significantly smaller and lower level than many other structures and visual detractors in the landscape. Views of the plant are limited given both its size contextually and other built form in the local landscape. It is advanced therefore that there will not be significant impact to the local landscape or visual amenity more generally.

Traffic and Transport

- 5.27 The site will share the neighbouring food manufactures access with and extension leading to the application site. The site's entrance is already adapted to the highway to be able to accept HGVs via a dedicated right turn lane. There is a detailed breakdown of expected traffic movements with regard the operational phase of the development included as appendix 2.
- 5.28 The site will make use of approximately 64,000 tonnes of feedstock per annum, it will be a mix of waste provided by local food producers and purpose grown energy crops from a collective of local farmers within a 14 mile radius of the site, shown on the attached plan at appendix 3. There will be no long term storage of feedstock on site.
- 5.29 Agricultural feedstock will be ensiled and stored on local farms, with daily deliveries being undercover in the fully enclosed reception building. The digestate produced will be spread as a biofertiliser back onto the land used to produce the agricultural feedstock. Both digestate and feedstock will be transported using a dedicated HGV trailer which can haul both feedstock and liquid digestate avoiding empty runs and thus 'wasted' journeys. As all crop feedstock coming into site will be ready to use due to offsite ensiling there will be no seasonal effect on transport due to harvesting times.

- 5.30 Other movements are expected due to the site's use as a biogas filling station anticipated for use by local haulage firms. These are the only additional movements that will be caused by this development over and above deliveries as the generated gas will be transported by the national grid gas pipeline. It would be also fair to acknowledge that any operators utilising the biogas filling station would already be in the area and as such this minimises the distance they have previously needed to travel for fuel.
- 5.31 Based on the carrying capacity of the bespoke HGV that will be used approximately 2133 deliveries of feedstock per annum would be required. Based on the feedstock used it is predicted around 48,000 tonnes of digestate will need removing from site, equating to 2000 loads. As the HGV will be back loaded with the digestate, 2133 movements will account for all the movements associated with both feeding and emptying the digester. Additional movements for the 5 full-time (equivalent) employees and a further 2 movements per month for servicing of the site. There are 12 parking spaces provided on site as shown on the submitted plans.
- 5.32 The majority of movements will come from the local HGV's using the site as a biogas filling station, meaning there will likely be no increased use of the highways in this area. It is also worth noting that the effect of the additional movements will have a limited overall impact on the highways due to the strong transport infrastructure in the area. In addition, the site isn't a residential area and as such there will be little nuisance caused by increased traffic or noise associated with the movement of HGVs.

Odour

- 5.33 The wider physical site characteristics have been carefully considered in the layout, positioning and design of the AD plant in order to prevent any odour concerns. In addition, the proposal has incorporated a range of odour mitigation measures throughout its technical design and for the operation of the plant.
- 5.34 A full odour and air quality assessment has been undertaken which models the extent and magnitude of the likely impacts. This has been undertaken owing to, and notwithstanding the predicted minimal impact, the proximity of the site to residential uses. The content of this assessment can be found at appendix 4.

Physical Site Characteristics

- The prevailing wind blows to the north east meaning any potential odour will be blown in the opposite direction of any residential dwellings. The land to the north is open and has no structures at all within 1.5km of the site
- The mature treeline that surrounds the site will help to dissipate any potential odours from the site
- The site is part of an established industrial estate which contains both water and sewage treatment plant, power station and other processing industry.

Technical Design and Operation of the Plant

- The plant will use 64,000 tonnes of feedstock
- There is no crop ensiling on the site
- The feeder is located within the technical building. Bio filters will be installed which are designed specifically to deal with odour and meet the relevant standards set out by the EA permit. The building is also under negative pressure to ensure that any air must run through the filter
- No vegetable waste will be stored onsite, removing the largest potential odour source
- On passing to the digester, the entire digestion system is sealed as the digestion process relies on the absence of oxygen thus minimising the risk of odour arising from the AD operation; there will be no odour emissions from the digestion process itself
- After the digestion process the material will be stored and transported back to local farms via HGV return journeys. From here it will be transported to then spread onto fields.
- Given the sealed pumps, pipes and valves, there should be no emission of odour whilst removing the liquid digestate from the store to the bespoke HGV.
- Biogas plants are often designed positioned close to villages to connect to local heating networks. Because odour is effectively designed out of the process, it is not envisaged to be an issue at the nearest sensible receptor. However as part of the EA Permit requirements and as a matter of good practice a routine boundary olfactory test will be carried out regularly

Other Identified Odour Sources:

Emission Source	Emission Characteristics	Comment
Feeding	Possible odour emission when loading feeder	All feed elements sealed inside process building
Digester	Enclosed process no emission expected	Not considered

- 5.35 As part of the permitting process the plant operator will set out procedures for monitoring the plant for odour in line with good practice and should a question be raised regarding odour, a procedure will be followed responding to the event within 24 hours and investigating the question raised. Where such an investigation identifies an odour issue remedial action will promptly be implemented.
- 5.36 Based on the location and design of the plant, and the operational procedures which will be adopted and as will be required by the mandatory EA permit. The risk of odour impact at nearby sensitive receptors is considered to be extremely low.
- 5.37 The 'waste' element to the plant's feedstock is as set out by the relevant permit mentioned above. It is the intention of the proposals to utilise farm produce and waste from food preparation and manufacture, as detailed in said permit. These elements are sourced in a manner set out by the traffic and transport section of this statement.
- 5.38 The vegetable waste will be delivered directly into the reception area of the technical building which will have a negative pressure system and biofilter system. Daily deliveries will be fed directly into the digestion process. The control system and swift feeding will ensure odour is not an issue.
- 5.39 A full odour management plan will be prepared as part of the permitting process which has to be submitted to the EA. Note that this permit requires tanks to be bunded and reception to be inside a building which is the case.

Noise

- 5.40 There key potential noise emitters from the AD plant are listed on the table shown at appendix 9 which also sets out their relative dissipation over distance. The loudest of

these is the Combined Heat and Power unit (CHP). The location of these elements are shown on the submitted proposed layout plan.

- 5.41 The CHP unit is housed in a sound-proofed container within the technical building which is widely used by many technology providers for plants of this size and indeed larger. This achieves below 65dB (A) level at 10m not taking into account additional attenuation given by the building. As a comparison a toilet flush would achieve a level of 70 dB(A). The generator set runs at a constant speed.
- 5.42 A frequently used measure in determining noise levels from an emitter is that the noise level is reduced by 6dB each time the distance from the generator is doubled. This excludes any physical barrier to noise. As can be seen from the proposal layout plan the closest dwelling is over 200 metres from the CHP and thus would have a negligible wider impact given the proximity of major roads and other noise elements associated with industrial/commercial practices across the estate. As can be seen from comparing the table and the proposed layout, no significant emissions will affect any residential dwellings in the area.
- 5.43 All potential noise emissions sources such as the CHP, feeder and gas upgrading system are located so that the process building separates them from the closest residential dwelling; this will help to further reduce any noise. The traffic associated with the operation of the plan is set out by the relevant assessment and would give an indication of vehicular usage associated with the plant. This is an existing access used by HGVs in association with the neighbouring premises however and the timing of movements is envisaged to be during the day when expectation of amenity is different. The level of noise emitted from the proposed development therefore is unlikely to be more than the noise levels of current work on the nearby industrial area.
- 5.44 In conclusion the level of noise emitted from the AD plant is unlikely to have an impact that would be adverse effect on residential uses and in any event unlikely to be such that would generate an amenity nuisance complaint. As was the case with odour, the prevailing wind will assist the dispersion of any noise away from the nearest residential dwellings in a north easterly direction.
- 5.45 The chart below gives an indication of what different decibel levels represent.

west away from the site. The distance and the much enclosed setting of Otway House are considered significant mitigating factors against any adverse impact that the proposals may have. The remainder of listed buildings, as can be seen from the figure above, are separated from the site by other built development that cumulative has an impact on their relative significance

- 5.49 There are three scheduled monuments within a 5km radius of the proposed development the nearest of which is the Pinchbeck Engine located 1300m to the north east of the site. This engine is of significant importance to the agricultural background of the area having been used to drain the Fens for arable farming. Due to the distance combined with the shadowing effect of the surrounding industrial estate combined with the treeline masking the site there will be a negligible impact on this monument and it is expected, due to more distance locations, that there will also be no impact on the other monuments within the area. A summary table and accompanying plan of the identified monuments can be found at appendix 5 to this statement.
- 5.50 It is therefore reasonably concluded that the heritage impact of the proposals is considerably less than substantial, indeed likely negligible to low, and therefore should be balanced accordingly with the positive aspects of the proposals as renewable energy development.

Ecology

- 5.51 A full phase 1 habitat survey as part of a site walkover has been undertaken in respect of the proposals. A copy of this report and its associated findings can be found at appendix 6. Notes in this section refer to both the survey results and its own appended survey plan.

Reptiles

- 5.52 The majority of the site comprises a single field under arable cultivation, which is of low intrinsic ecological value. A raised uneven mound is present at the north-east margin of the field, comprising tall ruderal and scattered scrub, and has potential to support reptiles, should they occur in the local area. The field is bordered to the south and west by a mixed plantation shelter belt and to the north and east by a broad-leaved plantation shelter belt, all of which have potential to support breeding birds. Blue Gowt Drain runs to the north of the Site; three water vole burrows were noted on the north bank, but not close to the proposed tunnelling route. The Blue Gowt Drain also has potential to support foraging and commuting otter, but there is no or little potential for holts.

- 5.53 The raised mound in the north-east corner of the site has potential to support reptiles, and habitat to the north of the site provides a likely commuting corridor for reptiles to move between areas of suitable habitat in the surrounding area. Under current proposals, part of the grassy mound in the north-east corner of the site is due to be used for landscaping purposes and therefore reptile presence/ absence surveys shall be carried out on this mound, prior to it being dismantled. Survey shall involve the deployment of 30 refuges (large sections of heavy-duty roofing felt) within the tall ruderal/ scattered scrub area due to be affected by the development; followed by seven site visits to inspect the refuges for reptiles. The results of these reptile surveys will be provided in a separate stand-alone report, in due course.
- 5.54 If a significant number of reptiles are found to be using the site, trapping and translocation of the reptiles from the application site would probably be required. If only small numbers of reptiles are present, then it may be possible to use Sensitive Working Methods/ Avoidance Measures, to maintain their Continued Ecological Functionality (CEF). This could involve, for example, directional moving or strimming, from south to north, in order to encourage reptiles to move away from the Site, into adjacent habitat. Such measures that could be reasonably controlled through the use of appropriate planning conditions.

Great Crested Newt

- 5.55 The majority of the wider site contains unsuitable terrestrial habitat for great crested newt as it does not contain any water bodies. Blue Gowt Drain to the north of the site is considered unsuitable for great crested newt, due to a high likelihood of fish such as occupying the drain due to its river connection and the high level of shading caused by the steep banks. A garden pond located circa 350 m north-east of the site is separated from it by unsuitable habitat.

Water Vole

- 5.56 Three water vole burrows were found on the north bank of the Blue Gowt Drain, which runs approximately 20 m north of the northern site boundary. The data search results indicate that water vole are present in the local area, in Vernatt's Drain and LNR to the south, as well as in field drains to the north, east and west. However, the site itself does not contain suitable habitat for water voles.
- 5.57 A future gas pipeline will connect the anaerobic digestion plant with an existing pipeline situated approximately 140 m to the north. The proposed route will cross the

northern woodland shelter belt, Blue Gowt Drain, and arable land to the north. The pipeline will be installed using a horizontal drilling machine, at a depth of 2 m below the firm bottom level of Blue Gowt Drain. This depth shall be maintained below the drain and existing woodland shelter belt which abuts it, such that disturbance to the banks and the drain will be avoided, and the water level and quality in the drain will be unaffected.

- 5.58 Water voles burrow into the banks of water courses horizontally or upwards, up to a distance of 5 m away from the bank. Nesting chambers are dug above the water level (Gloucestershire Wildlife Trust, 2009). As such, drilling will occur well below the level at which water voles would burrow.
- 5.59 Drilling will last for a short period of time only. It has been found that water voles can tolerate short periods of bore-hole drilling (Arnott, 2001), and remain *in-situ* for such activities. No water vole field signs were found at the section of the Blue Gowt Drain under which the gas pipeline is proposed to pass, or the immediate surroundings.
- 5.60 The closest burrow found during the survey is located approximately 50 m to the east of the proposed drilling point. Overall, providing that the gas pipeline is installed at a minimum depth of 2 m below the bottom level of a drain, for a minimum of 5 m either side of the drain, it is considered that water vole will not be adversely affected by the installation of the gas pipeline.

Otter

- 5.61 Blue Gowt Drain is also suitable for otter, however no field signs were found. The data search returned four records for otter, in the River Glen, River Welland, and Vernatt's Drain. Under current proposals, the drain and adjacent bankside habitat will not be affected. As such, no further survey for otter is recommended.

Bats

- 5.63 The majority of the site has limited value to foraging bats, however the boundary woodland shelter belts, and Blue Gowt Drain and surrounding habitat to the north, provide high quality habitat for foraging and commuting bats.
- 5.64 The boundary woodland shelter belts will be retained. In order to retain the value of the boundary habitats for bats, pruning should only be carried out where necessary, and shall be light in nature. In addition, a sensitive lighting scheme should be adopted whereby no artificial light spill shall reach the woodland shelter belts, thus providing a dark commuting corridor for bats.

Birds

- 5.65 The arable field habitat on the site does not have significant value for many nesting birds, although it is considered likely that small numbers of skylark and possibly lapwing may nest within the central section of the field. As for bats, the boundary woodland shelter belts provide high quality habitat for nesting birds, and many nests were noted in trees along the northern and eastern Site boundaries.
- 5.66 It is recommended that arisings from pruning should be stacked in piles along the edges of the arable field, in order to provide habitat for hedgehogs and a range of invertebrate species, which will in turn benefit birds and bats.
- 5.67 Construction, vegetation clearance works and pruning should ideally take place outside of the main bird breeding season (which for most species extends between March and August inclusive), however if this is not feasible it is recommended that a check for nesting birds is undertaken immediately prior to habitat destruction. Should nesting birds be encountered, an exclusion zone around any active nests would be required to prevent damage of the nests and injury to the young birds until they had fledged.
- 5.68 It is recommended that nesting opportunities on the site be enhanced by the provision of nesting boxes. Four nest boxes should be erected on semi-mature trees on the north-eastern Site boundary facing east, away from prevailing winds. The nest boxes should be suitable for starling, great tit and blue tit, and should be erected at a minimum height of 4 m.

Flood Risk

- 5.69 Both the NPPF and NPPG explain the need for the sequential test, the obligation placed on decision making bodies to steer development away from areas at risk of flooding. Through the application of the ST, the decision making process should direct development from those areas at highest risk, to those at the lowest risk.
- 5.70 The proposal site is in flood zone 3 as defined by the EA flood maps and as a development site greater than 1 hectare, a flood risk assessment has been completed, based on a full topographical survey of the site. The results and recommendations of the FRA are set out at appendix 7 to this statement. The general conclusions agree that the development of the site, including specified methods and safeguards, are unlikely to increased flood risk elsewhere. The nature of the plant, its automated operation and lack of occupation of the site concludes that risk to persons is low overall.
- 5.71 Sequentially, and referring to the advice of pragmatism set out by NPPG, it is clear that there are substantial environmental benefits that sit alongside the consideration of the development's other planning merits in the balance, to support an argument in favour of the release of land for development in a flood zone notwithstanding the fact that the site is part of a wider extant employment land allocation at district authority level.
- 5.72 As well as weighing the renewable energy benefits of the scheme in the balance, a suitable location for a plant of this type and inherent connection with the agricultural industry is driven by other practical factors such as, but not limited to, the security of a feedstock and a geographical proximity thereto and the proximity of a gas grid connection of the correct pressure and capacity. In both variables' case therefore, the plant being proposed where it is is inherently more sustainable than if it were located elsewhere.
- 5.73 In response to the consideration of the Exception Test, this statement sets out not only the sustainability credentials of the development in renewable energy terms but also the logistical benefits of the site in terms of it being geographically central to farming operations.

Trees in Relation to Construction (BS5837:2012)

- 5.74 To facilitate the erection of the plant and part of the access point, some work is required in respect of the management of boundary vegetation. In accordance with British Standard BS5837:2012 a full arboricultural report has been commissioned which identifies the affected trees and sets out recommendations for management. The conclusions and recommendations of this report, in response to trees being a recognised constraint in the development process (and indeed a material consideration) can be found at appendix 8 to this statement.

6.0 Conclusions

- 6.1 The proposal essentially represents a security of green energy supply, reduced carbon footprints, a reduction in the use of mineral fertiliser and reduced herbicide usage through a more mixed arable rotation and is considered by the applicant to be essential to the needs of feedstock stakeholders in supporting the industry.
- 6.2 Climate change has become an ever prominent global issue with governments around the world signing up to numerous agreements in order to tackle the problem. Renewable energy has a vital part to play in reducing greenhouse gas emissions and meeting the UK's targets set out in the Climate Change Act 2008. Anaerobic digestion is a substantial renewable energy resource to be exploited. The proposed AD plant has the potential to replace electricity with gas to the local grid for local heat generation. This will then reduce the local community's reliance on the supply of non-renewable power via the grid.
- 6.3 One of the main considerations when assessing proposals for such developments is the impact the proposal may have on character of the surrounding landscape and the impact on neighbouring residential amenity. This planning statement has justified the proposal in relation to both of these concerns and it is concluded that the proposal will not have any adverse affects on the character of the site or its surroundings or on the amenities of nearby residents.
- 6.4 The National Planning Policy Framework provides an unequivocal signal of the Government's commitment to supporting the promotion of such developments. It is evident that the planning system will need to play its part in meeting the new agenda. The proposal has been shown to accord with the NPPF, being a truly sustainable form of development. The NPPF asks Local Planning Authorities to approve applications if its impacts are acceptable, which has clearly been evidenced in this planning statement.
- 6.5 This comprehensive proposal is a wholly policy compliant proposal, and therefore deserves the support of the authority.

APPENDICES

APPENDIX 1

Landscape and Visual

APPENDIX 2

Traffic and Transport

APPENDIX 3

Feedstock Radius

APPENDIX 4

Odour and Air Quality

APPENDIX 5

Heritage Search

APPENDIX 6

Ecology

APPENDIX 7

Flood Risk

APPENDIX 8

Arboriculture

APPENDIX 9

Noise Emitters