

FAO: Mark Niland
South Holland District Council
Planning & Development
Council Offices Priory Road
Spalding
Lincolnshire
PE11 2XE

Our ref: AN/2023/135169/03-L01
Your ref: H17-1097-23

Date: 24 April 2024

Dear Mark Niland

**Proposed plant based protein extraction facility and anaerobic digester plant
Land east of Surfleet Bank and west of Woad Farm**

Thank you for re-consulting us on the above application, on 04 April 2024.

Environment Agency position

We have no further comments to make in relation to the submitted documents dated 03 April 2024, ref: 'Technical description: Odour removal – Amendment 2' and 'Rev A Statement on Odour Control – Amendment 2' as they do not satisfactorily address our earlier concerns.

We therefore **maintain our objection** set out in our response dated 12 February 2024 in relation to foul drainage.

Information for the Applicant

Environmental Permitting

The plant-based protein extraction activities may require an environmental permit under Environmental Permitting Regulations 2016, Schedule 1, Section 6.8 the treatment of animal and vegetable matter and food industries.

The anaerobic digestion activities will require an environmental permit under Environmental Permitting Regulations 2016, Schedule 1, Section 5.4 disposal, recovery or a mix of disposal and recovery of non-hazardous waste, if the plant has a capacity to treat over 100 tonnes per day. If the plant has a capacity to treat less than 100 tonnes per day an environmental permit is required as a waste activity.

We note that on page 2 of the submitted Design and Access Statement dated 11 December 2023, ref: '3952' it states that space has been allocated for a future waste recycling plant. This activity will also require an environmental permit under the Environmental Permitting Regulations 2016.

The Applicant/Operator is strongly advised to contact the Environment Agency and request the enhanced pre-application service to discuss the proposals as it may be appropriate to combine all the activities within one Environmental Permit which will depend on size and capacity of plant and production rates, discussions will include points raised in the planning application form and other queries regarding the various activities being undertaken at the site:

- Waste storage and collection would need to be managed and contained in accordance with the permit with contingency planning for digestate;
- Details of the sustainable drainage system would need to be considered to be appropriate for a permitted activities as usually an impermeable surface with sealed drainage is required.

Pre-application advice can be requested through the Gov website: [Get advice before you apply for an environmental permit - GOV.UK \(www.gov.uk\)](https://www.gov.uk/get-advice-before-you-apply-for-an-environmental-permit).

If the applicant is able to overcome our objection outlined above on foul drainage grounds, we will provide further advice in relation to flood risk at this site

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, it is likely we will recommend the inclusion of a condition on any subsequent approval.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Danielle Maclean-Spencer
Sustainable Places Planning Advisor

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