

CCC/23/110/FUL | Farm-based anaerobic digestion renewable energy facility, construction of vehicular access/road to A1307, associated infrastructure and landscaping - Land At Streetly Hall Farm Webbs Road West Wickham Cambridge Cambridgeshire CB21 4RP

Objections to planning application- Anita Stone, local resident of Streetly End

General Comments:

The basis for this AD plant to produce sustainable energy is flawed because 44.8% of the 'feed stock' used to 'feed' this digester is maize silage (14,000 tonnes) and whole crop cereal (14,000 tonnes) (see Transport Statement Table 3.1.1 page 8). Maize in particular uses high levels of diesel in production and harvesting, and high levels of fertilizer in production. Maize is not currently a widely grown crop in this area but clearly it will become so to provide the feedstock for this AD plant. As maize produces more biogas it is likely that higher levels of maize will be substituted for waste materials in the future, which is likely to mean further increase in maize monoculture cropping in the area, as has occurred in Europe, for example in Germany. Growing maize and cereals to feed the digester also removes this land from food production, reducing food security and reducing potential environmentally friendly farming systems under future Government initiatives.

The amount of maize and whole crop cereal feedstock should be conditioned throughout the lifetime of the plant or for at least a certain time period to make this a truly sustainable energy production method.

Transport Statement:

Table 3.1.1 states 'The below table sets out the overall anticipated large vehicle transport movements to arise from the development annually, as provided by the Applicant. **Each 'movement' is calculated as a single vehicle accessing and egressing the site.**' i.e. 1 movement is actually 2 large vehicle journeys in and then out of the site and will be referred to as such in numbers used below. It goes on to state: 'It is anticipated that at least 10% of material will be transported to and from the plant via farm tracks or pipes within the Applicant's landholding and without the use of the public highway. **75% of the remaining material will be transported via the proposed A1307 access.** The transport movements anticipated to occur within the Applicant's landholding (not on the public highway) have been subtracted from the figures in the following assessment.'

It is my understanding therefore that 5368 large vehicle movements actually means **10,736 journeys/year** on the public highway of which **8052 (75%) will use the new A1307 access road**. The remaining 2684 (25%) access routes are not clearly explained, Table 3.1.4 'Annual Movements by Location' refers to a large number of movements from 'other farms' but which access routes they will use is not clear. It is therefore assumed that the remaining **2684 journeys will access using the Dean/Webbs Road access from the north (impacting on either Balsham, West Wrattling or West Wickham villages) or Streetly End/Webbs Road from the east impacting Streetly End village**. It is clear from Table 3.1.4 that 550 large vehicles movements i.e. **1,100 journeys will come from Grange Farm, Balsham, through the eastern end of Balsham itself on the school walking and bus route and then down Dean/Webbs Road**.

'Table 3.1.2 Anticipated monthly large vehicle transport movements' page 9 of the Transport Statement shows that in each month **from June, July, September and October** 636 'movements'/month will be made which actually means **1272 journeys/month**.

Table 3.1.3 'Peak season proposed large vehicle movements' states 23 daily movements amounting to **46 journeys/day&night** i.e. (**34.5 journeys via the A1307 access route (75%)** and **11.5 journeys/day&night on the Balsham/West Wratting/West Wickham Dean/Webbs Road or Streetly End access routes**.

The transport statement states 'It is anticipated that at least 10% of material will be transported to and from the plant via farm tracks or pipes within the Applicant's landholding and without the use of the public highway.' Given that the pipe network will not be in place from the outset it is assumed this means that **a further 1074 journeys/year will use farm tracks to access the site**. The transport statement does not clarify these routes but given the location of the surrounding land holding and Park Farm land it is likely that **this 1074 journeys will take place mostly on tracks shared by footpaths (path 131/1) and the only bridleway in the area (131/21) further disrupting and reducing the value of this network**, see notes below in public assets section. The alternative route for this traffic is through the south western end of Streetly End and down Webbs Road, which as stated below is a quiet single track lane not suitable for this increase of large vehicles.

The Transport Statement makes no mention of tankers required to remove Biomethane off the site (Bio CO2 is calculated at 333 tankers/year). The application hopes to connect to the gas pipeline which runs adjacent to the Roman Road but there is no contract with Cadent to allow this and no plan within the application to do so. Given this there should be details of numbers of tankers required to remove the gas initially and ongoing if a contract can not be agreed. Using the figures for the Acorn BioEnergy site near Haverhill and scaling this down to the Streetly Hall site suggests that approximately 534 tankers per year will be required to remove bio methane, adding further to the large vehicle movement figures above and associated negative impacts.

Further to this the **Acorn Bioenergy Ltd AD plant application at Spring Grove Farm to the west of Haverhill** is just 4km from this site. Their transport statement states a further **9,786 'trips'/year** resulting at **peak times in 148 HGV/tractor movements/day accessing the A1307**, with those from Rectory and Dotterel farms using West Wickham Road i.e. passing through West Wickham, Streetly End and Horseheath to access the A1307.

Hence the transport figures and effect on the A1307 for both applications must be considered together by both Cambs and Suffolk county councils, not in isolation.

Transport figures are based on connection to the gas pipeline to the south of the site but this connection is not currently confirmed, if this is not possible it could result in significantly more tanker traffic required to export biomethane and CO2 off the site. This is not clearly shown in the application and export tanker figures are not given.

There is **no plan for the construction traffic** access routes within the application, page 5 of the 'Construction Traffic Management Plan' states 'Prior to the construction of the A1307 access, the site is still accessible via internal private trackways within the Applicant's landholding to allow construction of the access.' But there is no map showing these routes which will need to be accessed either via Dean/Webbs Road, the access to which will be through either West Wickham, Streetly End or Balsham villages. Appendix A of this documents shows that **there will be 2751 HGV 'movements' over the 62 construction phase, '1 movement = 1no. vehicle accessing and egressing the site' this gives 5502 HGV journeys** in total over the predicted 62 weeks construction phase. In 11 out of these 62 weeks there will be well over 200 HGV journeys/week, 9 of these weeks are within the first 18 weeks of construction

so highly likely to be before the new A1307 access route is available for use. This will have a significant impact on local villages and listed buildings within Conservation Areas. More detail is required on routes for construction traffic and conditions to ensure traffic does not pass through the villages.

The road network in the area is not suitable for this increased level of large vehicle movement. It will make the roads unsafe in this area and cause damage to road surfaces. The increased level of HGV/tractor and trailer movements through the villages will significantly reduce my and other residents' quality of life, impacting on health and well being.

If the Streetly Hall application is passed mitigation must be put in place to ensure the school walking/bus routes in all the villages are safe. Likewise mitigation must be put in place to allow users of the currently quiet PRow network and Webbs Road in Streetly End to continue to use it without fear of meeting large vehicles i.e. allowing space on the adjacent field edges to walk/cycle/ride.

Environmental impacts:

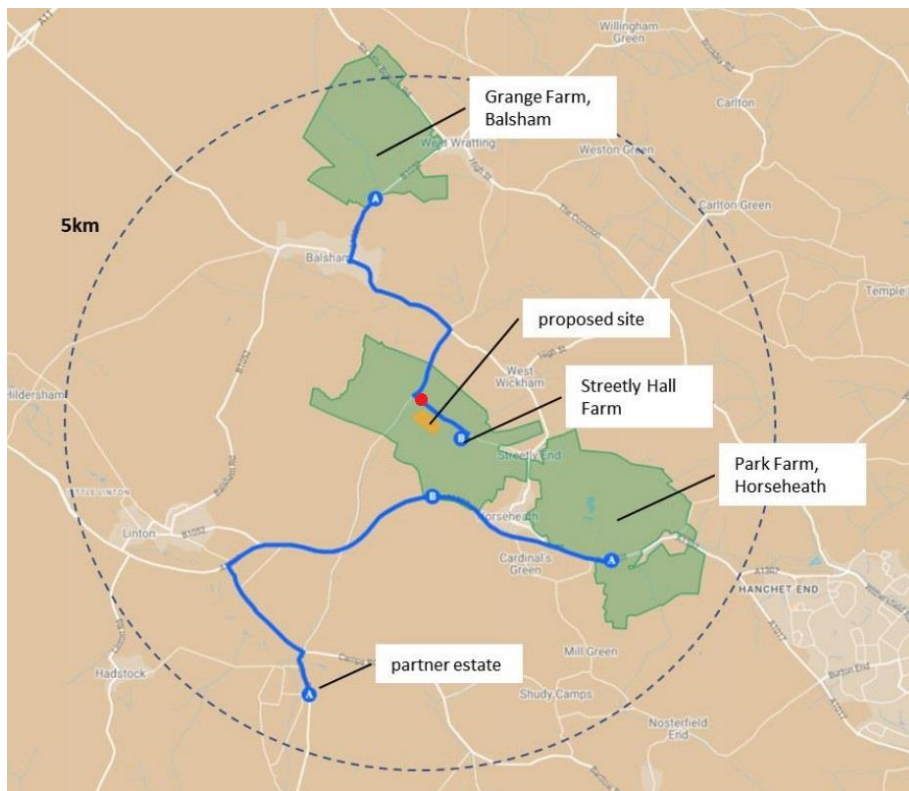
- **Transport:** It is proposed that the new lorry road will allow 8052 lorries and other large vehicles (tractors towing large trailers) per year to turn off and on to the A1307, across oncoming traffic lanes. The A1307 is undergoing considerable works to make it safer, including closing the central reservation at Dean Road crossroads to stop traffic turning right, across oncoming traffic due to the number of collisions in that area historically. Local residents turning across the traffic at the Horseheath Red Lion junction know how congested and dangerous this can be. To propose a new road used by lorries and tractors towing trailers to turn across oncoming traffic at this location will increase the danger of this road, increase congestion, and goes against the work of the Greater Cambridgeshire Partnership to make this road safer. The CCC transport assessment comments are incorrect to conclude that this proposal will not be detrimental to the highway in this area, they need to visit the site between 7 and 8.30 a.m. and 4.30- 6pm to assess this issue. It is proposed 2684 large vehicles will pass through either the eastern end of Balsham village on the school bus/walking route and use Dean/Webbs Road to access the site from Grange Farm in Balsham or through the villages of West Wratting/West Wickham or Streetly End (which routes will be taken is not clear see notes above), significantly increasing traffic on these narrow country roads with sharp bends and steep undulations.

Webbs Road is currently a rare example of a small, relatively quiet lane in an area with heavy 'rat run' traffic cutting through from Haverhill to Cambridge, and is therefore heavily used by local residents, including children to walk, cycle, horse ride and link to the PRow network. This will no longer be the case if 2684 large vehicles per year use this road.

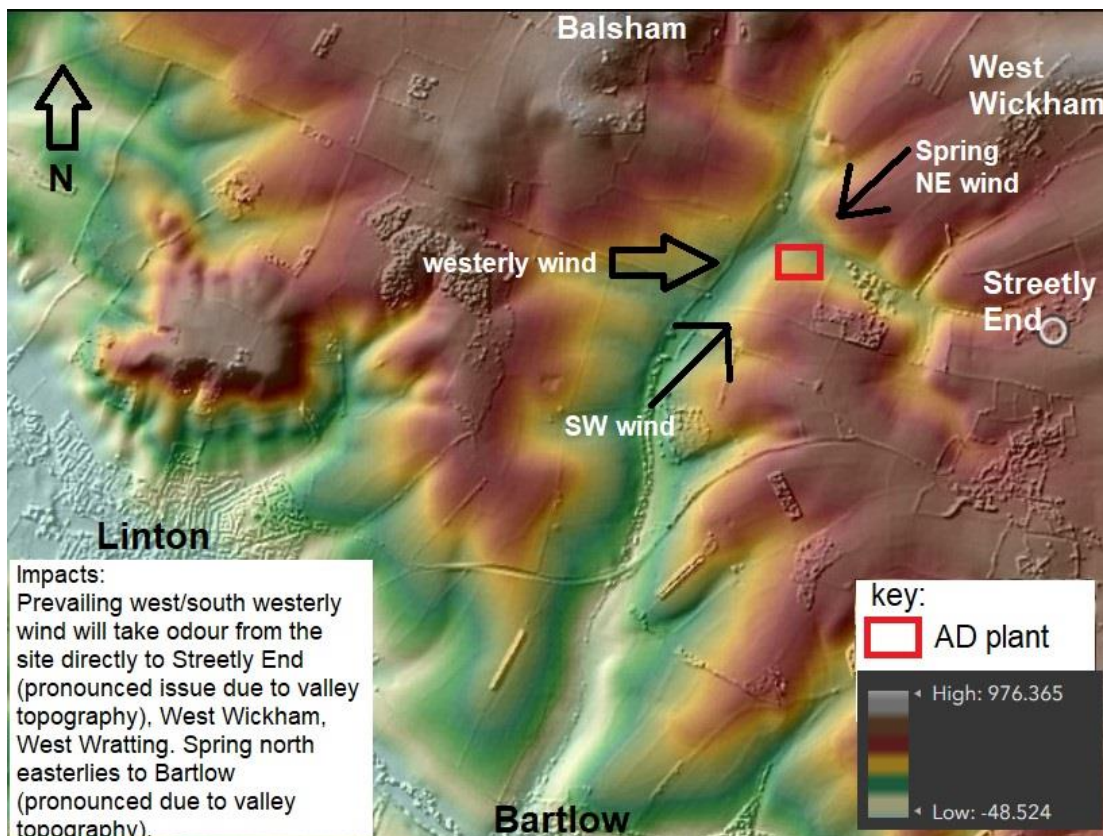
Photo showing the current narrow, country lane at the northwestern end of Webbs Road which will form one of the access routes for lorries/tractors and trailers certainly coming from Grange Farm Balsham and possibly from 'other farms' (undisclosed locations in the Transport Statement). The small hatchback shows the width of the road being unsuitable for lorries/tractors and trailers which will be travelling in both directions, needing to pass each other most days of operation but regularly during peak months:



Applicants map showing some of the transport routes with location of photo above shown as a red dot:



- Odour:** the odour survey is unreliable and inaccurate being based on the subjective classification of site odours as 'moderately offensive'. The input odour emission rates used are at least one order of magnitude lower than those of other similar AD planning applications. The meteorological data used in the assessment is from a site 25km away that does not account for the prevailing wind patterns and topography in this area and are therefore meaningless (Section 3.9 page 16) see map below. The assessment does not follow standard scientific practice for example including estimates of uncertainty. There are numerous unaccounted odour emission sources that other similar AD applications in the UK have used. The closest dwelling in Streetly End is 1.2km from the proposed site in a westerly direction, the closest dwelling in West Wickham is 1.18km in a south westerly direction. The prevailing south westerly winds will carry smell directly from the proposed site to these villages.



Further to this there are numerous examples of odour issues on sites that have been approved:

- January 2019: Residents subjected to 'unbearable odours' from AD plant in Ballymena
- February 2020 County & Borough Councillors appeal to the Environment Agency to shutdown the AD plant near Farleigh Wallop due to a 'most unpleasant' smell affecting hundreds of homes for 'sustained periods'
- March 2023: Environment Agency fines AD plant operator in Stockton-on-Tees for failing to control odour
- May 2023: Councillor reports that the Fernbrook plant near Rothwell "certainly does smell and It's absolutely disgusting".

If this application is approved conditions must be put in place for monitoring of the odour from the site to ensure this is rectified when it arises, if it is not possible to rectify the odour issues the site should be closed. However the lack of legal requirements for monitoring of odour once the site is commissioned is likely to result in local residents being subjected to significant reduction in quality of life and associated health issues for the 25 to 40 year life of the plant.

- **Noise:** 5368 'large vehicles' accessing and egressing per year, I understand this to mean 10, 736 journeys/year day and night PLUS another 10% within the farm, this will result in almost constant loud noise. Further noise from site operations will also occur including from the flare to release excess biogas. Due to the prevailing west/south westerly winds and topography of the area (see above) the noise of these vehicles entering/leaving and moving around on site, and operational plant will be heard clearly from Streetly End and West Wickham. These villages already hear the traffic noise from the more distant A1307 and concerts held on Horseheath racecourse, so there is no doubt that this noise will be heard, day and **night**. This will be particularly noticeable at night when other background noise is lower.

As above if noise pollution affects the local villages and reduces their quality of life and devalues their properties conditions should be put in place to rectify this or close the site.

- **Atmospheric and Water Pollution:** atmospheric pollution from feedstocks and digestate, such as ammonia, odour and dust will also be carried from the site to Streetly End and West Wickham. This will also affect the nearby Balsham, Lawn and Over Wood SSSI ancient woodlands, along with Hare, Borley and Leys ancient woods. Woodland is shown to be impacted by atmospheric pollution, reducing tree health and diversity. Light pollution in a dark skies area will reduce environmental quality for residents and wildlife including bats, moths and barn owls that all use this area. The site is within a groundwater protection zone and sits on chalk, hence contamination of ground water is likely. A tributary to the river Granta, a rare chalk stream already suffering from pollution, runs along the northern and western boundary within less than 100m hence surface water is also at risk of pollution.

The Cambridgeshire Green Infrastructure Strategy June 2011 refers specifically to the Granta and Chalk Rivers Project and protection of these features.

Further habitat creation should be done to the west of the site to extend the currently small woodland planting to the south west of the site to link it to the woodland planting around the main site, and to buffer the stream all the way along its north western side. Chalk grassland could be created in the remainder of the arable field to the south of the site, linking to the chalky flora already present on the Roman Road. This should be conditioned as part of any approval.

Given the above I feel this proposal is not supported by the following local planning policies and strategies:

The West Wickham Neighbourhood Plan (adopted by SCDC in September 2022) states in Policy WWK/7: Biodiversity and green infrastructure: Development proposals will be expected to retain features of existing biodiversity value including the following which are locally valued and contribute to the Parish and wider district's strategic green infrastructure. **1. The Roman Road (Policy Map 8)..... Any development proposals which would cause loss or harm to features of biodiversity value will not be permitted** unless the need for and benefits of the development outweigh any adverse impacts and where replacement habitats are provided as part of the proposal. Development should provide a net gain in biodiversity which could include: 1. The creation of new natural habitats appropriate for important wildlife species. 2. The planting of additional trees and hedgerows. 3. Restoring and enhancing existing biodiversity networks (see the broadened wildlife corridor in Figure 30) which in turn will support the Cambridgeshire Green Infrastructure Strategic area.

The Cambridgeshire Green Infrastructure Strategy June 2011 refers to the Roman Road as linear landscape features 'west of Cambridge form 'fingers' that extend into the wider countryside, as do the linear landscape features of the Worsted Street Roman Road' (page 113).

It goes on to say:

'Looking at the Green Infrastructure themes, investment in this strategic area offers significant opportunities for: □ Biodiversity: by enhancing, linking and **protecting** the nationally, internationally and locally important nature conservation designations within the area. This includeslinear archaeological features including Roman roads.....

- **Light Pollution:** As far as I can see there is little mention of the potential light pollution created by this application. The West Wickham Neighbourhood plan states: 'Policy WWK/6: Dark landscape - Development proposals which include external lighting will only be permitted if the night sky is protected from light pollution. This means the proposed lighting: a) Is the minimum appropriate for its purpose (for example turned off when it is not needed); b) Is designed such that lighting is directed

downwards to avoid spill up into the sky or out of the site (for example with a beam angle below 70 degrees); c) Avoids light spillage beyond the area intended to be lit. Proposals where external lighting is required should include information about layout and beam orientation, a schedule of the light equipment proposed including luminaire type, mounting height, aiming angles and lumen unit levels'

Given the size of buildings proposed (16m in height) there is high potential for light pollution. Further plans showing this need to be submitted.

Public Assets: Bridleway number 21 running from the Horseheath/Streetly End road to Dean Road, 2km in length. The proposed lorry road will cross this Bridleway which is the only bridleway in the area that services all the local villages (West Wickham, Streetly End, Horseheath, Balsham). This Bridleway links to the byway to the north west that runs all the way to the southern edge of Cambridge, and is therefore used by many people. It is a national route 'The Harcamlow Way'. The proposed lorry road will cross this bridleway at a high point on the route and so will be visible to horses/walkers/cyclists along most of the route, with 8052 crossings per year, concentrated in June/July, September/October when usage by riders is highest. Hence the entire setting of this peaceful route is affected. The noise of these lorries will also be clearly heard along the route. Nervous horses will no longer be able to use this route because they are frightened by large vehicle movements and noise, and all users will lose the ability to use the only off road route that is free from traffic in the area. This will be a huge loss to all users of this route, especially horse riders.

Definitive map of the area showing bridleway 21 in green centrally and the proposed lorry road in red:

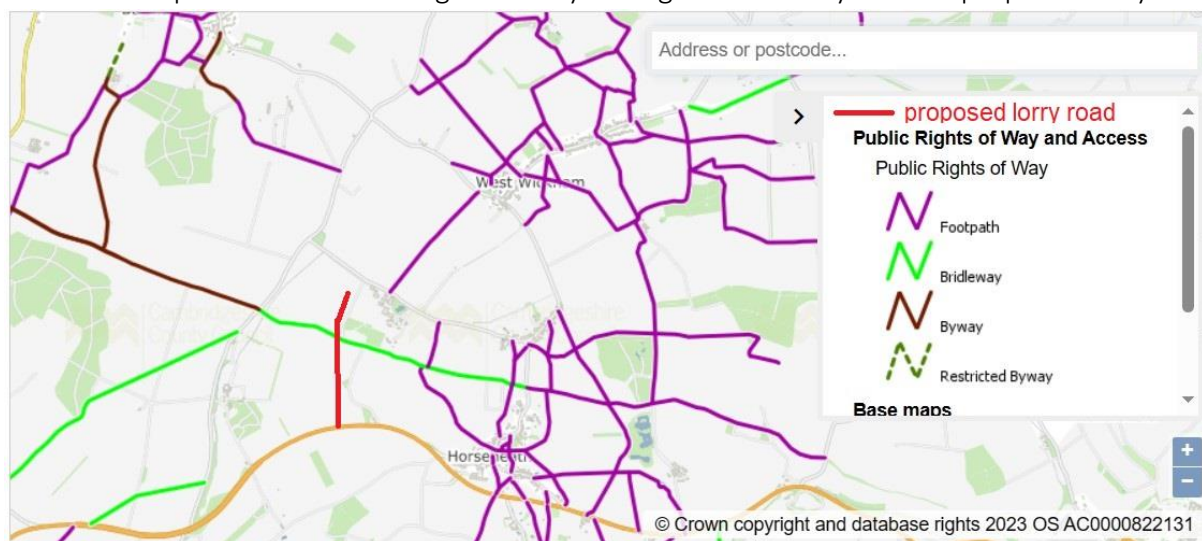


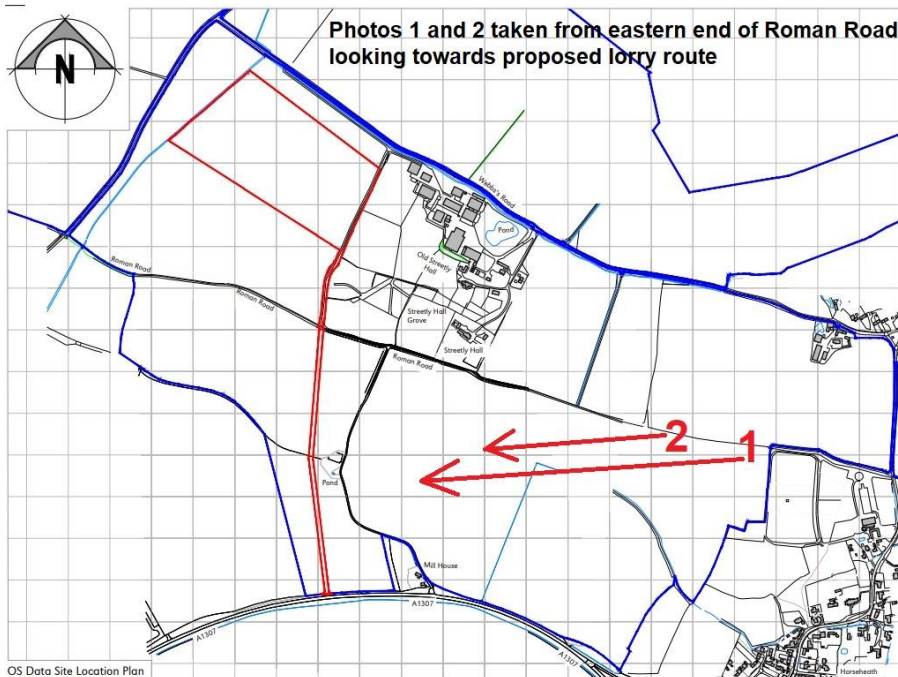
Photo 1 shows the view from the Eastern end of the Roman road where the bridleway emerges from a short tree lined section (see map below for location point). Because the proposed lorry road is at the highest point in the landscape it will be visible almost from the start of the route. The presence of telegraph poles on the horizon (c. 9m tall) allows approximate depiction of lorry height objects (c.4.9m tall) in this landscape. The presence of Mill House on the left of the photo also provides scale within the landscape allowing visualisation of lorries. This will have a clear visual impact for all users of the bridleway but particularly for horses, being flight animals they will pick up on this movement and noise in the distance and become nervous reducing the value of this bridleway significantly.



Photo 2: visual impact from slightly further down the Roman Road (see map for location below)



Applicants Location Plan with location of photos 1 and 2 shown in red with directional arrows:



The West Wickham Neighbourhood Plan states:

'Policy WWK/8: Access to the countryside: The existing network of public rights of way, footpaths and bridleways will be retained and enhancements to this network will be encouraged from development proposals located within 300 metres of a public right of way. Proposals which will impact adversely on the public enjoyment of rights of way will not normally be supported. Opportunities to link two or more public rights of way or enhance existing rights of way as part of a development will be supported.'

Hence this application clearly impacts adversely on the PRoW network and is in contravention of the West Wickham NP.

Myself and my daughter currently ride our horse along this bridleway every day, as he is a nervous horse it will no longer be safe for us to do so, especially during the peak months of June/July and Sept/October. Given this is the only bridleway in the area we will therefore have no off road riding routes available at all.

Permanent mitigation must be put in place to account for the damage to the only Bridleway in the area. There should be a planning condition to upgrade several of the footpaths on their land to bridleway to make alternative, circular routes i.e. upgrading path 253/12 east of Streetly Hall would allow horses to turn off the bridleway before meeting the lorry road, 131/1 I believe used to be a bridleway but was downgraded, it forms the eastern end of the Roman Road and is used as an agricultural track as well as footpath, this should be reinstated to bridleway, 253/16 east of Hare wood, 253/25 north of Hare wood, 253/27 west of Hare wood would all create circular routes off 131/1 to compensate for the damage to the current Bridleway.

Historic Environment: Worsted Via Devana Roman Road Historic Environment Record number 07970 (time period AD 43 to 409) runs from Godmanchester to Colchester lies along the southern edge of the site. The proposed lorry road carrying 10,736 large vehicles/year will cross this site. A no dig solution may avoid damage to this historic feature but this will then impact on the Bridleway, see comments above.

The proposed transport routes will pass through the Conservation area in Balsham and given the lack of clarity over many of the routes are likely to pass through the West Wickham and Streetly End Conservation Areas where numerous Listed Buildings will be negatively affected by the vibration caused by increased HGV/Tractor and trailer journeys.

West Wickham Neighbourhood Plan states: Policy WWK/3: Heritage assets: Development proposals should conserve the significance of designated heritage assets such as listed buildings, conservation areas, the scheduled ancient monument at Yen Hall and their respective settings. Development proposals that affect non-designated heritage assets or are located in the Conservation Areas, are required to be accompanied by a heritage statement setting out how harm has been avoided or minimised or the significance of those assets more effectively revealed for the community to appreciate. Where proposals would have a harmful effect on either of the following, a balanced judgement will be applied having regard to the significance of the asset and the scale of the harm: 1. A non-designated heritage asset identified in Policy Map 4. **2. The Roman Road (Wool St) – Policy Map 8**

It is clear that the damage to the Roman Road is in contravention of this policy.

Landscape:

The 'Greater Cambridge Landscape Character Assessment' produced in 2021 shows the site location as being on the border of the West Wickham Wooded Claylands and the Linton Chalk Hills both of which are identified as having good condition of landscape character type and strong strength of character of landscape (fig. 4.2 and 4.3). The document goes on to state that objectives in these areas should: 'Conserve: Landscapes of strong character in good condition and therefore judged to be of high quality where emphasis should be on conservation of existing character and of particular features that contribute to this character. The aim should be to continue the current landscape management regimes and adopt best practice approaches. Great care will need to be taken in the introduction of new characteristics. Enhance: Landscapes of strong/moderate character in good/moderate condition where the emphasis should be on enhancing existing character. This may include improvements to current landscape management regimes and adopting best practice'.

The proposed industrialisation of this area therefore does not meet these objectives. There will be very high landscape impact from the Bridleway (131/21) to the south the footpaths to the north west (253/2) and north east (253/11), Dean Road from the west, Webb's Road to the north, High Street West Wickham from the north and surrounding land in a currently rural, rolling landscape unspoilt by large, industrial development.

Planning application for 'land to the south east of Burton End, West Wickham, CB21 4SD APP/W0530/W/22/3300777' was refused on the basis of 'the character and appearance of the area including landscape', hence a precedent has been set for considerations of high landscape value in this Parish.

The proposed tree planting mitigation will not reach a height of 16m (the height of the highest dome) optimistically until year 26 (based on growth rates of common alder which is a particularly fast growing species (Woodland Trust 8.11.2021 British Trees and Shrubs to Plant).

The West Wickham Neighbourhood plan supports the protection of the rural views within the Parish and states: Policy WWK/1: Settlement patterns and identity: To be supported, development proposals must recognise, maintain and where possible enhance the existing landscape and settlement character in West Wickham parish. Specifically, development proposals shall: d) avoid significant adverse impacts on the locally distinctive and locally valued views defined on Policy Map 2 and, where demonstrated by the local planning authority, other such views within the Parish f) respect, retain or enhance the character and distinctiveness of West Wickham's rural landscape as described in the District's Design Guide SPD* (or any document that supersedes it) and as described in the supporting text to this policy.

The proposed site can be seen in the far-left hand corner of Figure 13 page 22 of this document.

- **Public Safety:** There are well documented cases of explosions occurring on these sites; Avonmouth and Seven Trent, Cassington, Oxfordshire in October 2023. Again there are no full plans associated with this application setting out these risks, their impact on the local environment/people and management of such events.
- **Local businesses:** Several local horse businesses located in this area rely on the relatively undisturbed routes off the main rat runs; the proposed 10, 736 large vehicle movements/year will heavily impact on these businesses, in some cases making them unviable with the loss of local employment. B&B

type businesses relying on the relatively unspoilt nature of this area will be impacted by the increased traffic/noise and smell, which will be worst during peak holiday season.

- **Information missing from the application:**

Further to the points above I believe the following information is missing from this application:

1. lack of construction traffic plan
2. lack of biomethane tanker numbers
3. lack of evidence for future connection to gas pipeline
4. lack of lighting plan
5. lack of detail on effect of heavy traffic on listed buildings on traffic routes
6. lack of decommissioning statement
7. lack of safety plan in event of explosion given recent events in Oxfordshire
8. lack of consideration of excessive water use when water resources are declining and will worsen with climate change
9. lack of detail on effects of climate change and increasing drought years/extreme weather events on models used for example the 2022 drought and extreme heat weather data was not used in the odour model.

Overall this application will significantly reduce my and other local residents quality of life, health and wellbeing and cause significant, irreversible damage to the local and wider environment as set out above.