

Anaerobic Digester



APPN: P12/V1807/FUL  
APPENDIX 1A:

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NOTES:  
1. ALL LEVELS ARE ABOVE:

KEY:  
PLANNING APPLICATION BOUNDARY  
EXISTING BUILDING CONTOURS

# APPN: P12/V1807/FUL

## APPENDIX 1B:

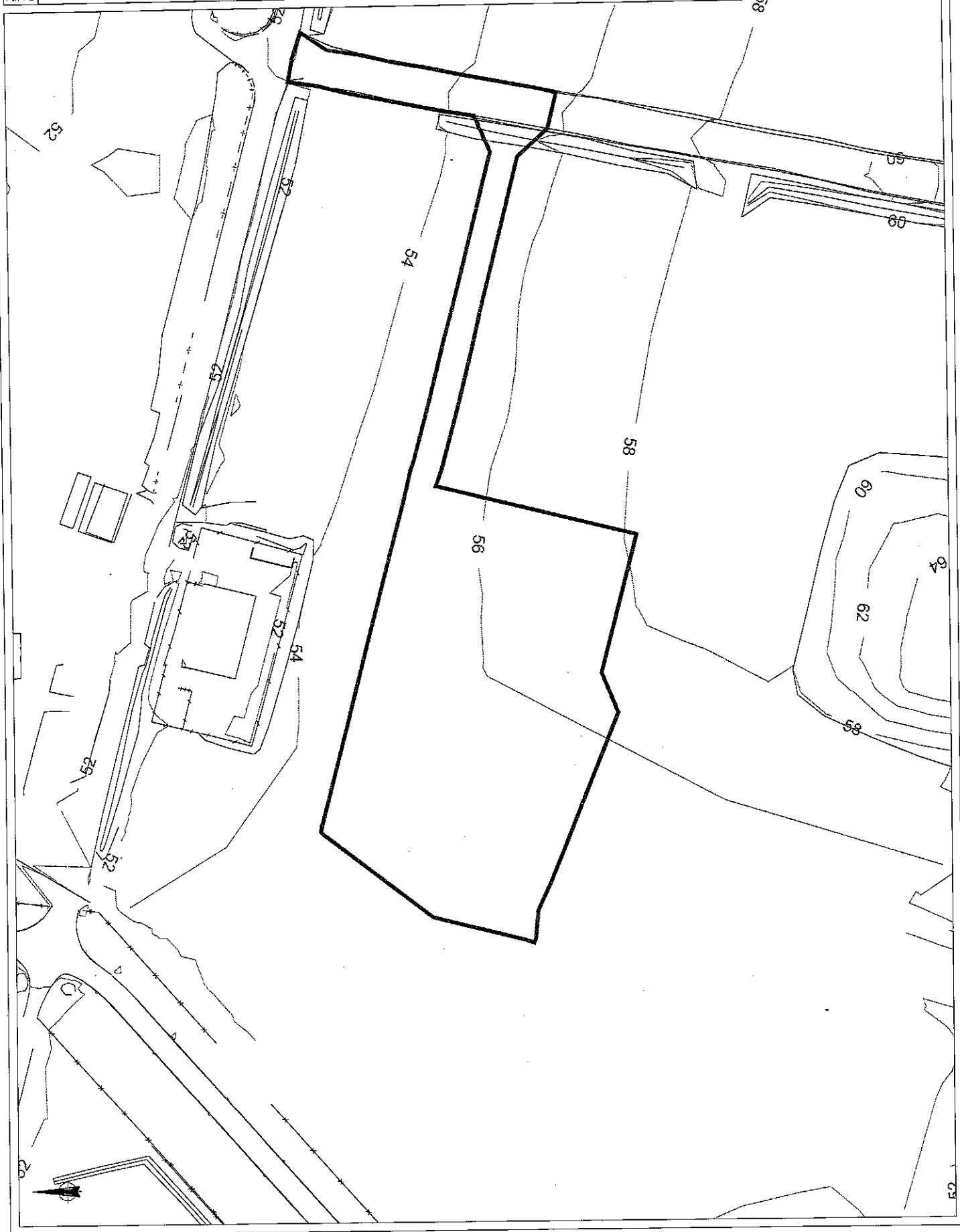
REV	DESCRIPTION	DATE



PROJECT:  
SUTTON COURTENAY AD PLANT  
PLANNING APPLICATION

PLANNING TITLE:  
PLANNING APPLICATION  
BOUNDARY

DATE:	19/7/2012	DATE:	19/7/2012
S.T.:	J.C.	PROJECT NO.:	WR710513/02
SCALE:	1:500	REV.:	0

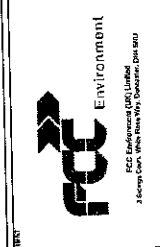




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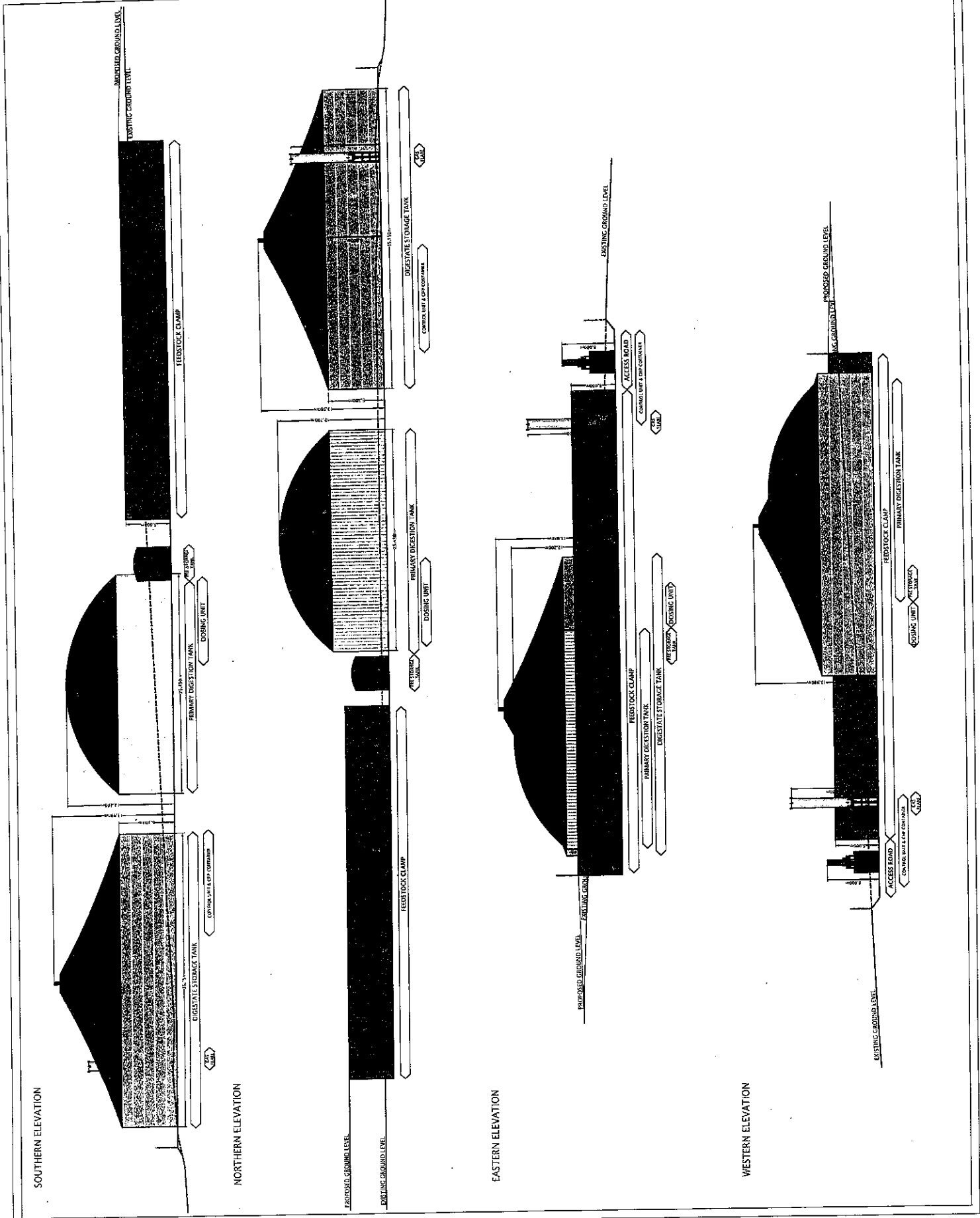
APPN P12/V1807/FUL  
APPENDIX 2B

NO.	DESCRIPTION	DATE	BY



SUTTON COURTESAY AD PLANT  
PLANNING APPLICATION

DATE	19/11/2012	J.C.	19/17/2012
S.T.	1:200	AI	WR07105/3/04
SCALE			



ELEVATIONS



APPN P12/V1807/FUL  
APPENDIX 2C

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Mr D Rothery  
Planning Services  
Vale of White Horse District Council  
Abbey House  
Abbey Close  
Abingdon  
OX14 3JE

7<sup>th</sup> February 2013

**For the attention of David Rothery**

Dear David,

**RE: P12/V1807/FUL PROPOSED ANAEROBIC DIGESTION (AD) FACILITY, SUTTON COURTENAY LANDFILL, APPLEFORD SIDINGS, ABINGDON, OXFORDSHIRE**

I write in response to the queries and questions raised during the recent site visit to the application site for the aforementioned proposal. This visit was attended by yourself, Avirl Williams (Landscape Architect, VoWHDC), and members of the planning committee, and was conducted by myself and Paul Marsh (Regional Estates Manager) on behalf of the Applicant FCC Environment. This letter seeks to address issues raised in relation to the following topics:

- Digestate storage tank capacity;
- Silage clamp capacity;
- Site levels;
- Colour / finishes of the facility;
- Implementation of off-site landscaping;
- Bund re-contouring; and
- Compliance with landscape policy and justification for the facility at Sutton Courtenay.

**Digestate storage tank capacity**

The digestate storage tank has a capacity of 26 weeks i.e. store up to 6 months of digestate and thus can cope with the NVZ regulations on closed period ( 4/5 months) , when spreading of organic manure is prohibited .

**Prohibited Periods for Application of Organic Manures with High Available Nitrogen Content**

Soil Type	Grassland	Other land
Sandy or Shallow Soils	1st Sept - 31st Dec	1st Aug - 31st Dec*
All other Soils	15th Oct - 15th Jan	1st Oct - 15th Jan

**from waste to resource**

FCC Environment (UK) Limited  
Registered Office: Ground Floor West, 900 Pavilion Drive  
Northampton Business Park, Northampton NN4 7RG  
Registered in England and Wales No. 2902416. VAT registration no. 637 8808 92.

### **Silage clamp capacity**

Our plan is to supplement the storage capacity of the silage clamp where necessary with temporary storage on the site through the use of 'ag bags' or a field clamp system. This will allow us to store maize for a temporary period on the parts of the site where it is harvested, as we currently do at present on the areas of agricultural land forming part of the restored landfill site. The long term plan is to negotiate storage capacity with the surrounding farmland and restored landfills as part of the feedstock contracts; this should also help in spreading the vehicle movements.

### **Site levels**

Cross section drawings of the proposed AD facility in the context of existing and proposed ground levels have been provided in the planning application (WR7105/3/04). This existing ground level rises from west to east and from south to north. In order to maximise screening we have taken the lowest existing ground levels on the west and the north as the proposed ground level for the development. This has the effect of sinking the facility approximately 4m below existing ground levels on the eastern side (as shown on the southern elevation), and up to 5m below existing ground levels on the southern side of the development (as shown on the eastern and western elevations).

### **Colour / finishes of the facility**

The proposed colour scheme for the individual aspects of the facility will be as per the plans and drawings included within the planning application. It is the intention that the finishes and colours will be sympathetic to the surrounding landscape and will complement the appearance of other temporary buildings and structures within the boundary of the landfill site, for example the Materials Recycling Facility (MRF). We expect that the final colours, finishes and treatments will be agreed under planning condition.

### **Implementation of off-site landscaping**

FCC has proposed a scheme of soft landscaping around the facility to enhance its setting and appearance within the landfill site. Whilst this landscaping is outside of the red line planning boundary of the facility under this planning application, we can confirm that FCC is the sole owner of the proposed land to be used and would accept a planning obligation attached to any planning permission if granted, to ensure that this scheme is implemented as proposed under this application.

### **Bund re-contouring**

We can confirm that the proposed AD facility development will require slight re-contouring of the bund on the southern boundary of the site due to changes in ground levels. This bund is a temporary storage bund that will be removed on completion of restoration of the landfill site, which is required by 2036.

### **Compliance with landscape policy and justification for locating the facility at Sutton Courtenay**

#### **Policy NE9**

DEVELOPMENT IN THE LOWLAND VALE WILL NOT BE PERMITTED IF IT WOULD HAVE AN ADVERSE EFFECT ON THE LANDSCAPE, PARTICULARLY ON THE LONG OPEN VIEWS WITHIN OR ACROSS THE AREA.

The supporting text for Policy NE9 states;



*"The long views over the patchwork quilt of fields, farms and villages in the Vale are an essential part of the landscape quality of the district."*

It is therefore accepted that the views across the vale feature farms and villages and are therefore not free of built development.

The proposed facility is, first and foremost, temporary. The application makes it clear that the facility will be decommissioned in 2037 one year after completion of full restoration of the landfill site. Objectors have raised the concern that this period is long enough to have an impact regardless of the temporary nature as it will be visible within the landscape (no specific viewpoints have been identified however) for over 20 years if consented.

Visual assessment of the proposed facility within the application makes it clear that the facility will not be widely visible, demonstrated by a full landscape and visual impact assessment (LVIA) within the application. This has proved that key views of the facility will only be achieved from viewpoints within the boundary of the wider landfill site itself. Objectors have raised concerns that the facility will be visible from a range of viewpoints, and that even if these viewpoints are in the minority, an impact is still present.

Rather than rely on the temporary nature of the structure or the limited availability of views, this report will address the objective of policy NE9 and the interaction of the proposed development with this objective.

The character of the Vale clearly includes dispersed agricultural development. A number of farms are present within the vista including large metal sheds and stores, workshops for farm vehicles, silos and storage tanks. The agricultural industry is prominent within the Vale and features in the majority of views. The supporting text for policy NE9 recognises this and cites it as 'essential'.

The proposed facility is agricultural in appearance, use and form. It will be impossible to differentiate from the type of infrastructure present on existing farms spread throughout the vale.

The proposed development cannot be considered to have an 'adverse effect on the landscape' if it is directly in keeping with features identified within the supporting text as 'essential'.

### **Policy NE10**

**IN THE URBAN FRINGES AND IMPORTANT OPEN GAPS BETWEEN SETTLEMENTS, AS SHOWN ON THE PROPOSALS MAP, DEVELOPMENT OR CHANGES OF USE WHICH WOULD HARM THEIR ESSENTIALLY OPEN OR RURAL CHARACTER WILL NOT BE PERMITTED.**

The supporting text for Policy NE10 states;

*"These fringe areas serve as gaps which help to maintain the separate identities of Didcot and its surrounding village communities and to avoid the coalescence of development in the area in general."*

The rural nature of the proposal has already been addressed. In visual terms, agricultural development within the Vale is in keeping with the landscape character.

Separation enabling the retention of individual identity for communities is considered an important function of policy NE10.

The proposed development is not considered to be of a scale or type sufficient to compromise the separation between communities. Housing development which blurs the boundaries of communities is almost exclusively responsible for the merging of identity, whereas the proposed development, which is temporary structure forming part of a similarly temporary operational landfill site, will not in any way redefine community boundaries or identity.

The proposed development represents relatively small scale agricultural infrastructure designed to operate within the context of wider agricultural land use. It is in keeping with the Local Plan's definition of landscape character within the vale as per Policy NE9 and is insignificant in relation to the 'identity of communities' protected by Policy NE10 as it does not interface with, distort or exacerbate community boundaries.

### **Safeguarding Open Space**

The term '*safeguarding*' has been used in relation to the proposed development during the consultation period. Whilst it is broadly understood that this term relates to Policy NE10 as discussed previously, it is considered prudent that this terminology be investigated.

Under Planning Policy, safeguarding is normally a term used in conjunction with statutory designations, most commonly the Green Belt (but also Areas of Outstanding Natural Beauty, Heritage Assets, Ecological Designations).

The proposed development site does not lie within any statutory designation. The site is not within the Green Belt, nor an AONB, nor does it have any specific ecological designation.

The common use of '*safeguarding*' therefore does not apply to the proposed development site and it can only be concluded that '*safeguarding*' is in fact a reference to the objectives of Policy NE10 which seeks to avoid '*coalescence*' of development. Using the language of the policy itself one would have to conclude that safeguarding refers specifically to '*protecting the identity of Didcot and its surrounding village communities*'.

In policy guidance published by the Department for Communities and Local Government, the following advice is given on development within the spaces between communities;

*"The purpose of land safeguarding is similar to Green Belt land use in that it is to contain the outward growth of settlements and to prevent coalescence of these and other settlements in the area. Essentially, to stop settlements becoming physically joined by the built form and in doing so, losing their essential character."*

This advice is consistent with the understanding of policy NE10 discussed previously in this document in identifying the primary aim of this policy as protecting the identity of communities.

The proposed AD facility at Sutton Courtenay cannot be seen to blur the boundaries between communities. The supporting text for policy NE10 published by Vale of the White Horse District Council themselves states that this policy is designed to prevent the loss of individual identity for local communities.

Should a developer propose large scale residential or mixed use development in the open space between communities then it is perfectly feasible, and indeed demonstrable to argue that such development would blur distinct community boundaries leading to an effective loss of identity. Trying to argue, however, that a single Anaerobic Digestion facility within the boundary of an existing brownfield site may lead to the loss of identity for local communities is considered unfounded.



## **Alternative Site Consideration**

A query has been raised as to the choice of location for the proposed AD facility within the boundary of the Sutton Courtenay site, and whether an alternative location outside of the landfill boundary, for example within the nearby Didcot industrial estate may be a preferential choice.

The Didcot industrial estate is located approximately 1.5km South of the proposed development site in the area immediately surrounding Didcot Power Station.

### Sensitive Receptors

Locating the proposed AD facility within the Didcot industrial estate would decrease the separation between the facility and residential receptors from approximately 1km to as little as 200m (depending upon placement) but certainly 350m on average.

Whilst the potential impacts of the facility have been considered negligible in the application, distance from receptors plays a significant part in this. A noise impact at 1km is significantly less than a noise impact at 350m and whilst the minor odour release from stored maize within the context of an agricultural setting 1km from housing is considered negligible, the same odour in close proximity to housing and with no surrounding agricultural mitigation may be considered more significant.

### Sustainability

The AD facility is a key component of the wider strategy for long term restoration of the landfill. This development is being proposed to secure a self-sufficient renewable energy supply for landfill activities and to support the restoration of the land to productive agricultural afteruse, through not only the land reclamation benefits of growing energy crops on restored parts of the site, but also the application of the nutrient rich digestate on these areas to promote soil improvement.

The AD facility will be removed one year after completion of full restoration of the landfill site and there will be no long term or permanent landscape or visual impacts. The development will therefore not conflict with but will indeed support the final restoration of the landfill site to agricultural farmland, as approved under the existing landfill planning permission.

Locating the proposed development within Sutton Courtenay forms a direct, functional link between the AD and the restoration of the wider landfill. Fuel crops planted as a component of restoration can be directly transferred to the AD facility without transport leaving the site boundary and digestate resulting from the process can be used within the restoration area directly.

Separating the AD from the wider landfill will only serve to increase vehicle movements for both the import of crops and the export of digestate. Whilst the distances are admittedly short (approximately 1.5km), the cumulative impact of requiring this additional distance for every delivery and every digestate export will equate to hundreds of additional kilometres travelled for no perceivable gain. This is clearly contrary to the principles of sustainable transportation.

### Locational Benefits

This document has already reviewed planning policy governing landscape and land use and concluded that the proposed development is in compliance with each.

With the proposed facility in compliance with policy it is difficult to argue why relocating the facility outside of the landfill boundary, for example within Didcot industrial estate, would be beneficial.

There is no compelling reason why the facility should not be constructed within the proposed development site at Sutton Courtenay. It has been proven that the development would not have significant adverse landscape or visual, or any other environmental, impacts and is consistent with all planning policy in this regard. Conversely the AD facility will provide a self-sustaining source of renewable energy to power a significant proportion of FCC's on site operations, thereby demonstrating consistency with all levels of energy generation policy in accordance with the principles of sustainable development.

In summary it is maintained that Sutton Courtenay landfill is the most sustainable location for this plant. Locating the facility elsewhere would undermine the fundamental objectives of this project which are to provide a self-sufficient energy supply for the landfill and its associated waste management facilities, and to enable active management of the landfill restoration. Situating the AD plant in a central location within the landfill site close to existing developments ensures the energy it generates is as close to its final end use as possible, thereby maximising energy efficiency and minimising energy loss, for example due to friction. The surrounding and adjacent land of the restored landfill is not only the primary source of the AD plant's feedstock but is also the main outlet for the digestate bi-product. This co-location avoids the traffic movements associated with maize/energy crop imports and exports of digestate that would occur if the facility were to be located outside the boundary of the landfill.

I trust that these details are satisfactory. Should you have any queries about this information please do not hesitate to contact me.

Yours sincerely,



**Sarah Henderson - Estates Manager (secondment)**

Direct Dial: 07892882020 | Email: [Sarah.Henderson@fccenvironment.co.uk](mailto:Sarah.Henderson@fccenvironment.co.uk)

**Sent on behalf of Paul Marsh, Regional Estates Manager**

# Sutton Courtenay Parish Council

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Mr. D. Rothery,  
Development Control,  
Vale of White Horse District Council,  
Abbey House,  
Abingdon,  
Oxon.  
OX14 3JE

25th September, 2012

Dear Mr. Rothery,

**P12/V1807/FUL Proposed development and operation of an anaerobic digestion facility  
Land at Sutton Courtenay Landfill Site, Sutton Courtenay  
For: FCC Environment Ltd**

Sutton Courtenay Parish Council objects to the application on the following grounds:

## **Planning Policy**

The application for the incinerator was refused by the County Council on 26th October 2009 as it would represent a permanent building in the countryside, contrary to policies NE9, NE10, NE11 and GS2 of the Vale's Local Plan. The application for the Mechanical Biological Treatment Plant too was refused on 20th September 2011 by the County Council as the need for such a facility in this location had not been demonstrated such as to justify overriding the conflict with countryside and landscape policies and harm to the landscape and countryside in the immediate area. The greenfield status of the site has been established by the refusal of these two previous applications. As such any application for a permanent facility should justify why this site has been selected and provide the results of a site selection study.

Earlier this year under, reference 12.00174/FUL, the District Council considered an application for an anaerobic digestion facility. Officers recommended the application for refusal in their report to Planning Committee, but it was withdrawn prior to determination. The fundamental basis of the recommendation was conflict with the various countryside, community facilities and general policies referred to above and to the absence of any identifiable, beneficial local need of sufficient weight that might have enabled the setting aside of the conflict with the Development Plan. This current application is virtually unchanged from the previous scheme besides which, the applicants appear not to have heeded the advice or guidance offered by Stuart Walker in his pre-application response letter dated 8 July 2011.

The proposed site is identified in the Vale of White Horse District Council's Local Plan as an area for landscape enhancement and also as an area of important open land between Didcot and Appleford. Policy NE10 in the Local Plan states that the Council would not permit encroachment by development or changes of use which might change the essentially open or rural character of the area. The creation of permanent development would not permit the land

to remain "open land" as required by the Policy. The reasons for refusal for the previous applications are still applicable to the current application.

Policy NE9 requires the Council to have regard to the impact of development arising from colour, texture, height and scale on the local landscape and on long open views from surrounding areas. Given the fact that the Didcot "A" is coming to the end of its life, the proposed anaerobic digester, if permitted would become the main blot on the landscape and consideration should be given to Policy NE9, in that the view from the Ridgeway would change substantially when the cooling towers are removed. Such development on open land would lead to the coalescence of settlements, and the loss of the separate identity of Sutton Courtenay. Sutton Courtenay is very separate from Didcot.

Although the Adopted Local Plan is now quite old, it is believed the policies previously identified both by the Parish Council and in your Officer's earlier report are still material considerations of sufficient weight and should be rigorously applied to this application. That said, the Parish Council takes the view that the new National Planning Policy Framework must also be viewed as particularly relevant.

Whilst the general thrust of The Framework is of a presumption in favour of sustainable development, bearing in mind the highly inadequate submission that you are now considering, there appears little within it that would support this application. To the contrary, there are many statements within The Framework, where the Government makes it quite clear that community involvement, quality of living, quality of place etc are vitally important when considering development proposals.

For example, as early as the first page under the heading Ministerial foreword, 'sustainable' is defined as meaning "ensuring that better lives for ourselves doesn't mean worse lives for future generations." Further into the Ministerial foreword there is another statement regarding the natural environment – "Our natural environment is essential to our well being and it can be looked after better than it has been."

In defining 'achieving sustainable development' The Framework suggests there are three dimensions to sustainable development, all of which have an important role for planning to play; an economic role, a social role and an environmental role. This badly thought out and presented application does not appear to fit neatly within the assessment or definition of any of these roles. The proposal will not:-

- o Contribute to building a strong, responsive and competitive economy;
- o Support a strong, vibrant and healthy community; and
- o Contribute to protecting and enhancing our natural, built and historic environment.

There is much more, that could be noted, from The Framework, which convinces the Parish Council that the proposed anaerobic digestion unit is quite inappropriate for this site, but as planning authority, this can be assessed as part of the processing of the application. Suffice it to say that for the further reasons set out below, we do not feel that the proposals satisfy any of the thirteen topic issues identified under the heading 'Delivering sustainable development'.

#### **Environmental Impact Assessment**

The Parish Council believes that an Environmental Impact Assessment should have been submitted as the application is for buildings of and structures for the sole purpose of producing

electricity. The proposal is one of manufacturing or producing energy, as such it falls within category 3a of the EIA Regulations which relate to industrial installations for the production of electricity steam and hot water. The criteria or threshold is where the area for development exceeds 0.5 ha. The red edged application area appears larger than in the previous application and is in a different location. The proposal creates a cumulative impact, given that existing composting facilities cause problems with odours which are being investigated as statutory nuisances, together with the operation of the landfill site and the setting up of recycling facilities. The application presents a significant additional industrial process with permanent structures some 46 feet high on a site which, in a few years, according to existing planning consents, will return to greenfield. No quantitative site specific odour and noise assessments have been submitted as part of the application. Please would the District Council advise why an Environmental Impact Assessment has not been requested.

### **Cumulative Impact and Odours**

The residents in Sutton Courtenay and surrounding area are currently troubled by odours from the composting activity at the landfill site. These concerns are regularly reported to the Environment Agency, who inspect and have been monitoring the activities of FCC in regard to the odours. So far a successful solution to the problem has not been found.

Owing to the number of complaints to the Environment Agency regarding the composting activities on the site, it issued a leaflet to households advising that they had to increase the number of routine site inspections, carry out odour surveys, continued to work with FCC to try and identify further improvements to management procedures in order to minimise odour. As a result of the stench from the site, FCC had to remove a significant proportion of the waste being treated on site, had to suspend a significant waste contract and it had to reduce the volume of material accepted on site. FCC committed to minimising the need to agitate the decomposing material which gave off an odour. It had to put a large amount of compost into landfill in order to reduce the impact on the surrounding residential area.

Again this Summer, there have been numerous complaints lodged with the Parish Council and the Environment Agency by local residents regarding the constant odours occurring at the site. The Agency did attend and substantiated an odour and the site manager was required to take a course of action to reduce the source of the odour. Indeed the Agency has been continuing to attend reports of odour from the composting operation and are continuing to ask FCC to review its odour management plan with the aim of minimising odours detected off site.

The Parish Council is greatly concerned regarding the cumulative impact of adding additional potential sources of odours. There is a statement at 3.9.4 in the supporting statement with the application that the digestate is odourless, but no evidence to support this. Whilst the anaerobic digestion is essentially a sealed process, there is the potential for odour emissions from the storage of crops in clamps, transfer of this feedstock to the digester, the pulling out and the storage of the digestate and subsequent transportation and spreading. There is no information as to the spreading techniques. Such movements give rise to numerous opportunities for the release of offensive lingering odours and loss to the atmosphere. There is no detailed plan of any odour management measures or any assessment of the potential for odours from spreading the digestate. Yet looking at PPS22 it states that in handling applications for anaerobic digesters local planning authorities should consider carefully the potential impact of odour and the proposals put forward for its control. This is not possible when this issue has not been addressed. In addition there must be enough land in the vicinity of the digester that can accept the digestate, yet the site is affected by the nitrate vulnerable zone designation.

### **Origins of Feedstock**

The Parish Council would question the origins of the feedstock. The Energy Crop Area Plan in the application shows only a slight increase in land available for cropping. In order to continually supply and run an anaerobic digester a considerably larger supply of maize, or other crops, would be required than can ever be produced on site. Mathematically calculating the on site maize yield, allowing for crop rotation, weather conditions, an average maize yield will be no more than about 1400 tonnes per hectare per annum. At para 2.1.1 there is a statement that the plant is capable of processing up to 10,000 tonnes. Subsequently referred to as 9200 per annum. There is then reference to a combined heat and power unit of 500kW. However 16,000 tonnes per annum would be needed to produce 500kW. If the plant can process up to 9200 tonnes per annum then the output electrical power is limited to  $500 \times 9200 / 16000 = 287 \text{ kW}$ . This is only about half of what is claimed in the application.

There appears to be extravagant claims of yields quoting 40 or 42 tonnes per annum, yet the estimate for the first year is 20 tonnes per annum. A 100% increase in yield is totally unrealistic and seems to rely on incorrect assumptions about the use of crop rotation, improved maize types and improvements to the soil. Without crop rotation, the soil condition worsens. It can be foreseen that crop yield would be no more than a figure of 15 to 20 tonnes per hectare. Therefore the most yield that could be expected from on site production is about 1750 tonnes per annum. This is far short of the plant throughput capacity of 9200 tonnes per annum. As a result the proposal would require significant transportation of additional crops. There will be a substantial impact on the road network in the area with consequent additional transport emissions, pollution and noise.

### **Transport**

The application suggests that traffic would use the north and south exits with deliveries using the northern access. The Appleford Road is already a very busy road being the access route to the A415. Traffic queues back to the centre of Sutton Courtenay at peak times owing to the traffic light control on the bridges. There is planning approval for 155 more houses in Appleford Road, 15 of which have or are nearing completion. These too will add significantly to vehicle movements in the area. The road is too congested already to accommodate the proposed additional increase in slow moving tractors pulling trailers which would impact on the overall road network.

FCC has recently sold compost from the site. Local farmers have employed hauliers to collect it for them and deliver it to local fields. Sutton Courtenay has recently suffered large articulated lorries going through the village. There is a real fear that there will be substantial increase vehicular movements from the anaerobic digester proposal through the village where there are many listed buildings. Three of these, the Church, Norman Hall and the Abbey are Grade I. Both the High Street and Harwell Road have traffic calming humps. An increase in vehicles along the historic High Street will only add to the vibration in these buildings many of which were built without traditional foundations.

The centre of the village has a weight restriction limit and is limited to vehicles less than 7.5 tonnes. However, as mentioned there have been recent complaints from residents regarding large articulated lorries in excess of the weight limit, operated by hauliers entering the village, going over traffic calming humps, causing noise nuisance, disturbance and pollution.

Investigations have shown that whilst originating at the landfill site, their journey was not controlled by any routeing agreement, as they were private contractors employed by farmers to

collect compost and not part of any site landfill/compost operation and therefore did not come under the control of FCC. Whilst it may be possible to control the delivery routes to the site as part of any planning conditions, it would be impossible to control other contractors removing digestate and then having business in the parish. The proposal would only lead to unacceptable vehicular movements through a rural residential area.

### **Other Issues**

There is reference to a combined heat and power unit, however, in the documentation there is no reference made to the CHP other than electrical output. No provision has been considered for the use of the "heat". Electrical power will be needed for the operation of the AD plant, and auxiliary items. From the likely 287 kW generated, and part of this being used for the onsite AD plant, there would be very little surplus and nothing really available for exporting to the grid.

There is no benefit to the local community, no surplus power generation, no stated use for any heat, just the impact of a large increase of vehicles which cannot be controlled, going through the parish causing nuisance and disturbance, together with the impact from the stench of the operations and digestate, together with visual intrusion in open land.

### **Conclusion**

- The proposal presents a medium scale industrial development with the importation of feedstock and disposal of digestate up to 10 – 15 km away.
- It represents new industrial facilities at an inappropriate location identified as "open land" in planning policies and which is close to a concentrated residential population.
- PPS22 states that development proposals should demonstrate any environmental, economic and social benefits and how any environmental impacts have been minimised. Without an environmental impact assessment, achieving this requirement has not been possible.
- The buildings, tanks and chimney at up to 14 m in height would impact on the landscape and affect the amenity of the open greenfield area and rights of way network.
- The data appears inaccurate, the expectation of available land for crop growing seems unrealistic, maize yield is over estimated and as a result the calculations for electricity production are considerably higher than what could reasonably be expected.
- There is the potential for enormous uncontrollable traffic and odour problems.
- There is no local need for the buildings and as a result there is negligible benefit for the community.
- This is a site where 2 previous applications for permanent facilities have been refused owing to their permanent nature, lack of need and being contrary to policy.

The Parish Council therefore would urge rejection of the application.

Yours sincerely,

L.A. Martin  
Clerk to the Council

## APPLICATION WEB COMMENTS FORM

*Information available for public inspection and available on our website*

**Location :** Sutton Courtenay Landfill Site Corridor Road Didcot Oxfordshire OX14 4PW

**Proposal :** Proposed development and operation of an Anaerobic Digestion facility on Land at Sutton Courtenay Landfill Site. (Re-submission of withdrawn application P12/V0174)

**Application Reference :** P12/V1807/FUL - 2

Please complete

<b>Your name :</b>	Appleford On Thames Parish Council
<b>Your address :</b>	
<b>Date :</b>	26 September 2012
<b>Response :</b>	Refused

Use the space below for your comments

APPLEFORD-ON-THAMES PARISH COUNCIL  
Mrs Lucy Dalby (Clerk to Appleford-on-Thames Parish Council)  
76 Evenlode Drive, Didcot, Oxon, OX11 7XQ  
Tel: 01235 817464  
Email: applefordpc@googlemail.com

25th September 2012

Mr David Rothery  
Head of Planning  
Vale of White Horse District Council  
Abbey House  
Abbey Close  
Abingdon  
Oxon OX14 3JE

Dear Mr Rothery

Application Reference: P12/V1807/FUL (Full Application)  
Application Type (see definition over): Major  
Proposal: Proposed development and operation of an Anaerobic Digestion



Strategy, chiefly a major housing development north of Didcot, must be taken into account in the consideration of this application.

An Environmental Impact Assessment has not been included in the application and no thought seems to have been given to the cumulative environmental impact of adding an Anaerobic Digester to the current composting site, the Materials Recovery Facility and the landfill site.

As you will be aware, the residents of Appleford have had to deal with the issues surrounding the visual impact, as well as the noise, dust, flies, smells and windswept refuse, associated with the landfill site, composter and power station along with corresponding large amounts of road and rail movements. South westerly airstreams exacerbate the situation.

The residents have, over the last decade or so, had no choice but to undertake campaigns to prevent this situation worsening. This has included the WRG proposal to site an incinerator, the materials recycling facility, the previous AD application and this further FCC application for this plant.

We fear that this constant pressure will ultimately result in the industrialisation of the area and that the landscape will never be returned to agriculture as residents were assured. Indeed, this application paints a picture of an industrial area and states clearly that FCC is looking to further integrate additional waste management components within the site. It is vital that the Greenfield site status of this area is respected and upheld. This is even more important with the planned decommissioning and demolition of Didcot Power Station

We feel that there is no local community benefit, benefit to Oxfordshire or the UK, or benefit to the exporting communities from this application. Very few jobs will be provided and the expectation is that local land will be diverted from food production to biofuel.

The application states there will be an increase in lorry movements in the Sutton Courtenay direction over the bridges a route which is already congested during peak periods, and traffic problems are exacerbated by recent and planned housing development along this route. There will be a significant increase in noise, dust, odour and vibration from vehicular movements, loading and unloading, on the site and the road to the Didcot bypass during the construction, operation and decommissioning phases, plus strong external lighting during the construction phase. There does not appear to be any consideration of slow agricultural vehicles coming out of the site onto the Didcot ring road.

FCC has a history of seeking variations to their operations, failing to provide vital plans and documentation regarding their current permissions and failing to make the necessary safeguards to mitigate against the nuisance caused. This, and the quantities and height of the mountains of waste at present, mean we are affected far more than was ever envisaged.

This application does not include an impact assessment for decommissioning



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working locally and nationally to  
protect and enhance a beautiful,  
thriving countryside for everyone to  
value and enjoy

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1st October 2012

Dear David

***Application P12/V1807/FUL: Installation of an Anaerobic Digester (AD) at Sutton Courtenay  
Landfill Site by Waste Recycling Group - Resubmission***

CPRE wish the restoration of the Sutton Courtenay landfill site to be carried out to a well-defined timetable and to a high standard. We note the applicant's expectation that government subsidies for renewable energy from anaerobic digestion (AD), based primarily on maize feedstock, may support a cost effective contribution to the restoration of the site as good quality farmland. However we have serious concerns about:

- the planned timetable and the physical scale of the plant;
- the potential impact of feedstock imports for traffic in the vicinity of the site;
- the difficulty, in the absence of an environmental impact assessment, of confirming the applicant's assertions that the plant will cause minimal odour or other adverse implications for local communities.

The application should not be approved without clear, binding and enforceable conditions to deal with these issues

### Background

In considering the application, CPRE have taken account of the Council's general strategy to concentrate development within the main towns and to protect the countryside from sporadic development and of the three Landscape Policies covering the site as laid out in the Vale Local Plan 2011, namely:

NE9. Lowland Vale: Development will not be permitted if it would have an adverse effect on the landscape, particularly on the long open views within or across the area

NE11. Areas for Landscape Enhancement: Proposals for development ... must provide a landscaping scheme which enhances the appearance of the area. Development which would further erode or damage the character of the landscape will not be permitted.

NE10. Urban Fringes and Countryside Gaps: Development or changes of use which would harm their essentially open or rural character will not be permitted.

We have also taken account of the Council's policy CF10 on renewable energy under which proposals relating to the production of renewable energy on a commercial basis are generally supported unless harm is caused in terms of visual impact, adversely affecting living conditions of local residents or adversely affecting areas and features of natural conservation importance.

## Timescale

While landfill operations continue, the plant might not seem especially out of place. But once those operations are completed (in 2030 on current plans) it will be wholly incompatible with the Council's policies NE9, 10 and 11 cited above. The plant will be a major industrial intrusion on the landscape, especially for users of the rights of way across the land - and will be all the more obvious when Didcot A and its cooling towers are dismantled. In that context we are concerned by the indication that full rehabilitation of the site will not be complete until 2036. That is six years later than we and local communities have believed to be the case. There is confusion where there needs to be clarity; a clear plan for the site's future management should be developed and well publicised. The planning drift that has characterised operations on the site for many years must not be allowed to continue.

**The application should not be approved in the absence of a clear and definitive timeline for completing operations on the site and an agreed strategic statement of the milestones necessary to achieve it.**

## Scale

The application shows some improvements over its predecessor (application 12/00174/FUL) in that the major structures are reduced in height and better located to take advantage of existing land contours. However the feedstock clamp is approximately six times larger and much more obtrusive than in the miscalculated and highly misleading earlier plans. All the major components of the AD site are far too big to justify the applicant's claim that they are consistent with an agricultural environment. The development would look like - and would be - an industrial site, and would be an unacceptable eyesore in the absence of early and effective screening

**The application should not be approved without a condition requiring the immediate planting of the trees shown immediately around the AD site in the proposed restoration scheme (drawing number 427R251A)**

## Realism of assumptions

The application sets out to allay local concerns, in particular about traffic, by suggesting that half the feedstock will be grown on reclaimed land in the landfill. Although this claim is less farfetched than the exaggerated claims made in the earlier application we remain sceptical about its realism because we believe it to be based on yields at the high end of what could be achieved in favourable conditions making no allowance for bad years. England is on the margin of the area within which maize can be grown and yields are especially vulnerable to cold and wet conditions - as is amply demonstrated by the poor maize crops in the area this year.

The revised application also differs from its predecessor in postulating the possible use of crops other than maize as feedstock. While some easing of the dreary monotony of monoculture would be welcome, the AD plant is said to be optimised for maize, so the use of other crops will lead to smaller biogas generation and less electricity production.

Neither a shortfall in maize production nor a switch to other feedstocks should be used as an excuse to increase the traffic of delivery vehicles to the site.

**The application should not be approved without clear, enforceable and rigorously enforced conditions on the volumes of traffic supplying feedstock to the site. We suggest that upper limits of 700 movements in years 1-4, 500 in years 5-7 and 400 thereafter should be specified (see table in para 3.11.1 of the applicant's supporting statement)**

## Odour and other environmental impacts

Local residents have been plagued by excessive smells from the landfill site over the years and are understandably fearful that the AD will make matters still worse. We accept that - properly managed - the operation of the plant itself should not cause unacceptable odours. We note that the applicant believes that the digestate itself will be odourless and that its application to the land of the site will not cause a nuisance. We have not been able to satisfy ourselves that digestate is always odour-free

or that its application will not cause dust nuisance. We are dismayed that your Environmental Health Officer's comments on this application reveal a similar ignorance on his part. We do not see how the application could be approved without clarifying the point.

An Environmental Impact Assessment is needed to resolve Council Officers' uncertainty about digestate odour and to allay local residents' fears about other impacts of the site. The application should not be approved without clear, enforceable and rigorously enforced conditions preventing the operation of the AD plant and associated activities from causing unacceptable odours, dust or other nuisance to local communities

#### Conclusion

The application should be refused unless the conditions identified above are imposed and enforced.

Yours sincerely

Mark Baker CBE (member Vale District Committee, CPRE)