

APPENDIX B – PUBLIC CONSULTATION (JANUARY 2024)

SUMMARY OF RESPONSES

Highways and Traffic

Welham Road and Welham Lane

- Concerns that the proposed development would pose safety risks to pedestrians (including but not limited to walkers, children, horse riders, cyclists, dog walkers, Fernie Hunt) using Welham Road and Welham Lane by increasing the volume of HGV and tractor/trailer traffic on a single carriageway road with no pavement. Particularly concerned about the stretch of road from the A6 junction to the site entrance.
- Concerned that, although the short distance between the A6 junction and the site access might not enable much speed to be generated, there would need to be particular awareness of the chance of meeting pedestrians.
- Outlined the importance of Welham Road as a key access to public rights of way and local countryside; public footpaths across the fields from Sutton Bassett to Great Bowden offer the only safe way of walking or cycling between the two.
- Concern that as Welham Road has a single carriageway, vehicles meeting would have to reverse to pass each other, blocking the road.
- Outlined that Welham Road is a no through road/ dead end to motorised vehicles so currently does not get much vehicular use. Concerned the proposal would change that.
- Concern that nothing has been proposed before on Welham Road that has required such regular heavy vehicle traffic.
- Concern the slow-moving nature of HGVs and tractors with trailers would cause attempted dangerous overtaking, on a single carriageway road.
- Concern the road is in poor condition and increases in traffic, especially from HGVs, would further degrade its surface.

Welham Road and Welham Lane- National Cycle Network (NCN) Route 64

- Concern the introduction of HGVs would increase danger to users of NCN 64.
- Outlined Sustrans (who manage the NCN) state that where the NCN is not traffic-free it should either be on a 'quiet-way' section of road or be fully separated from the adjacent carriageway. Traffic speed and flows should be sufficiently low, with good visibility to comply with design guidance for adequate sharing of the carriageway. Signs and markings should highlight the NCN clearly.

- Concern, large numbers of HGVs crossing and coming to a standstill blocking the single carriageway road would not be conducive to safe cycling, particularly with restricted visibility when travelling down the steep hill from Great Bowden.
- Questioned whether consultation with Sustrans or Cycling UK would be made as part of the determination process. Concern there is a significant risk of injury to cyclists coming down the hill towards the entrance to the plant, possibly at high speed.
- Concern that in order to be safe, the cycle route would need to be fully segregated from HGV traffic to avoid serious accidents, with cyclists having priority.
- Concerned that many of the current and future recreational users of Welham Road and Lane would have their safety and amenity compromised by the increase in HGV and tractor and trailer traffic as a result of the proposed development.

Welham Road- Bridge (Over A6)

- Concern that the bridge over the A6 and stretch of Welham Road to the south of the A6 is a narrow, single lane carriageway used by pedestrians with a blind summit to most vehicles. Concerned there would be an increased risk of accident on this stretch of road from traffic associated with the development. Concern that the only place to take refuge are grass verges.
- Concern that there was a 7.5 tonne weight limit on the bridge which has lapsed since the closure of the mushroom farm. Concerns that HGVs, which could have a gross weight of 44 tonnes would be crossing the bridge, causing structural damage and endangering users of the A6. Concern the bridge ramps are already subsiding under the light use they have been subjected to date and are liable to further damage.
- Concern there are no provisions provided to prevent HGV movements across the bridge.
- Concern this stretch of road is liable to a 50mph limit allowing large vehicles to travel at these speeds legally.
- Concerned if conditions are imposed to prohibit vehicles from using the bridge, these would be broken and unenforceable, for example drivers could still take wrong turns or sat nav systems would take drivers the quickest route. Concerned this is more likely as the site has not got its own postcode.

A6/Welham Road Junction

- Concerns that there would be a substantial number of HGVs and tractors with trailers entering and egressing the A6 at this junction, particularly slow moving vehicles turning right onto the A6, a 60mph road. Concerns with the safety risks and congestion this could cause. Concerned that this could increase dangerous manoeuvres at this junction, given the relatively long time it could take to safely pull out onto the A6. Concerns this could lead to a potentially fatal accident.

- Concern that exiting the A6 at this junction means manoeuvring and decelerating into a 90-degree corner which could be hazardous without a diverging taper/lane.
- Concerns regarding poor visibility at the A6 junction, including for vehicles coming from the A6 looking right onto Welham Road.
- Concern the slow-moving nature of HGVs and tractors with trailers would cause attempted dangerous overtaking, particularly on the A6 a 60mph road which does not always reflect the true speed of some vehicles on the road.
- Outlined road safety concerns with this A6 junction outlined within the Great Bowden Neighbourhood plan. In the last 13 years, there have been six accidents at this A6 junction (Source: Crashmap Accident Data), one of them serious and there have been 25 accidents, 3 of them fatal on this short 2 miles stretch of the A6.
- Concern vehicles exiting Welham Road onto the A6 should only be able to turn left, similar to another site which operates along Welham Road. Concern that, without the addition of a central island, barrier or roundabout, the safe entry of vehicles from the proposal to the A6 cannot be guaranteed.
- Concern regarding multiple HGVs queueing to access the site, potentially backing onto the A6 causing congestion and overtaking.
- Concerns that more people are using the junction now due to a large increase in the size of Great Bowden.
- Concern that there is already too much traffic caused by existing developments, including reference to application reference: 22/00679/VAC, and from the growth of traveller camps along Welham Lane. Concern this would lead to intensification of the use of A6 junction.
- Concern that there is no Swept Path Analysis shown for HGVs exiting the A6 turning left into Welham Road. Concern as the turn onto Welham Road is a tight radius HGVs could have to swing out into the centre of the road, towards the right turn lane from the opposite direction, to get round this tight radius. Concern this creates an additional accident risk on a high-speed section of road.

Local Road Infrastructure and Capacity

- Concern that the proposed development would cause an increase in HGVs being routed or misrouted through Great Bowden. Concern of the impacts on the narrow roads, unable to handle HGVs, causing damage, congestion, and dirt on roads (Main Street, Station Road and Dingley Road Welham Road via Sutton Road or Langton Road). Concerns raised around the safety of pedestrians, particularly during the school run.
- Concern that there is not a way to control or manage vehicles from passing through Great Bowden.
- Concerned if conditions are imposed to prohibit vehicles from routing through Great Bowden, these would be broken and unenforceable, for example drivers

could still take wrong turns or sat nav systems would take drivers the quickest route. Concerned this is more likely as the site has not got its own postcode.

- Concern regarding the potential damage of country roads and verges, and the roads and verges of other small villages, caused by the increase in vehicle movements of the proposed development. Concern dirt material could be deposited on these roads.
- Concern the proposal would impact the main roads towards Market Harborough and the residents and businesses along the A6 towards and on the McDonald's roundabout (where the A6 meets the B6047).
- Concern that vehicles on the B664 travel at high speed, concerns regarding safety with an increase in HGV movements
- Concerned that the impact on the A6 would be felt around the area as people head to/from the A14 and Leicester.

Parking

- Concern that the proposal does not integrate wheelchair parking spaces, or cycle parking facilities.
- Questioned how the applicant arrived at the 6 car parking spaces figure for staff and visitors.

Construction Phase

- Concern that there would be an increase in traffic during the construction phase.
- Concern there would be an increase in construction traffic along the line of the pipeline proposed to run alongside Welham Lane which could impact dog walkers.

Previous Applications Refused

- Outlined a number of previous applications at and near the site which were refused on highways grounds, questioning what has changed since these applications to make the situation acceptable when congestion in the area has increased since (References: 14/01553/OUT; 15/00901/OUT; 20/01497/FUL).

Transport Statement, Rev C, dated June 2023

- Concern that the Swept Path Analysis showed HGVs being unable to pass without mounting the verge and road edges, which will damage grass verges, hedges and trees.
- Concern that the report does not make reference to cycle safety.
- Concerned that a full Transport Assessment has not been commissioned to assess the safety of the development in line with the Leicestershire Highway Design Guide.
- Concerned the numbers provided by the Transport Statement could be inaccurate as the Severn Trent Green Power Plant at Cassington generating 2.1MW uses

approximately 50,000 tonnes of feedstock, solid and liquid waste. Concerned that the proposed development would require approximately 170,000 tonnes of feedstock, as it would generate 3.3 times more energy Cassington. Concern that 1MW unit requires 20,000 tons of maize per year so how could a 7.5MW unit require less than 20,000.

- Concern that some of the feedstock is typically transported by tractors and trailers, rather than HGVs, and that this would be likely to happen in practice, generating additional vehicle movements given the payload/capacity of such are usually less. Concern this is not reflected within the report, particularly during harvest season.
- Concern that, as per paragraph 4.4.2 of the report, the section of Welham Road between the site access and the A6 junction cannot accommodate two-way traffic. Concern road users must rely on an informal give-way arrangement in order to safely navigate it.
- Concern regarding the 12-hour duration of feedstock deliveries taking place between 06:00 to 18:00 hours as per paragraph 5.2.5. Questioned, with the working hours of the two members of staff being 09:00 to 17:00 hours (as per paragraph 5.3.2), who would let HGVs on site outside of 09:00 to 17:00 hours. Concern this could lead to a health and safety issue.
- Concern Appendix B of the report contradicts paragraph 1.6 of the Planning Design and Access Statement, ref: 1551 1 DAS LMS, dated June 2023. This is because paragraph 1.6 of the Planning Design and Access Statement states that one sheeted HGV containing chicken manure would visit the site per day, whilst Appendix B of the Transport Statement suggests typical vehicle movements of 22 per day rising to 52 at peak periods when all vehicle movements are taken into account.
- Concern that, as per paragraph 4.5.2, there would not always be sufficient space for HGVs to park on site, especially during peak times.
- Concern that the calculations provided within Appendix B, particularly in relation to the stated maximum of 4 two-way HGV movements per hour accommodating 52 two-way HGV movements per day, assumes '13' hours of continual deliveries and does not account for peaks, troughs or delays.

Highways and Traffic Mitigation

- Concern that, in the absence of appropriate mitigation, the development will cause unacceptable harm regarding highway impacts.
- Concern widening of the lane would not mitigate the impacts on highways safety. Outlined the danger is less if traffic has to stop and wait.
- Requested consideration of planning conditions, including that access to the bridge over the A6 be closed to vehicles. Also, as a condition, the provision of a footpath be installed from the bridge to beyond the new development suitable and safe for horses and walkers and preserving the existing cycle route in a safe manner.

Other Highways and Traffic Comments

- Concern that the above-mentioned highways and traffic concerns could be exacerbated by rush hour.
- Concern that the above-mentioned highways and traffic concerns could be exacerbated in winter, under dark and/or icy conditions.
- Concern the increase in traffic would be dangerous to school children walking, scootering and biking to school.
- In relation to the suggested roundabout by HDC, concerned the provision of a roundabout would require road widening which may be problematic at this location due to the position of the bridge and its foundations. Concern a roundabout would encourage even more traffic onto the Welham Road and Lane.
- Concern that successful maize clamping requires a quick harvest period which often translates to tractor drivers moving with urgency.
- Outlined an anaerobic digestion plant at Rothwell is provided with deceleration and acceleration lanes and even with this it can be a nerve-racking experience re-joining the A14. The A6 has a 60mph speed limit which is only 10mph less than the A14.
- Concern no consideration is given to encouraging future employees to utilise public transport/cycling.
- Outlined a Stage 1 Highways Road Safety Audit would conclude the development is inappropriate for the existing infrastructure network and existing junction.
- Concern that the road adjacent to the site is one way.
- Comments from Harborough Transport Action, objecting based on concerns regarding the A6 / Welham Lane junction, stating appropriate junction improvement with the A6 must be implemented in the interests of road safety. Also objected based on concerns regarding the potential impacts on cyclists, walkers and National Cycle Route 64. Outlined the carriageway width on Welham Lane adjacent to the site access is just 3.3m and there are narrow grass verges – wet and muddy in winter and further limited by vegetation growth in summer - which provide insufficient width to enable users to avoid approaching HGV traffic and reach a place of safety. Concern the proposal, through an increase in traffic, including HGVs, would have a detrimental effect on National Cycle Route 64 and would be unacceptable unless safeguards are put in place to protect the interests of cyclists and walkers. Outlined Great Bowden Neighbourhood Plan Policy T3.
- Concern the submitted Design and Access Statement suggests there would only be one vehicle a day versus what is actually set out in the Transport Statement.

- Concerned the proposal, if permitted, would increase the risk of damage to roads and would lead to increase in local repair bills.

Odour

- Concerns regarding the potential impacts of odour associated with the proposed development's use and storage of feedstock, in particular poultry manure and organic waste (straw). Concern this odour would be experienced 24/7.
- Concern that the process could produce volatile organic compounds that would cause odour.
- Concern that the proposed development would add to existing odour already experienced in the area.
- Concerns that potential impacts associated with odour from the development would be exacerbated in the summer.
- Concerned that nearby receptors to the site are separated by open country fields and the A6.
- Questioned what happens to the waste material once it comes out of the anaerobic digestion plant.
- Questioned what the clamp is used for and whether it is covered, and if so, would it be a cause for odour release.
- Questioned whether there would be any odour impacts associated with the flare stack.

Transport and Delivery

- Concern that the transport of waste to the site could cause odour impacts.
- Concern that the transport of digestate from the site could cause odour impacts.
- Questioned whether HGVs/tractor trailers bringing in waste to the site would be fully enclosed in the processing building before they are allowed to unload.
- Concern as to whether the manure transported from the nearby poultry farm would be secured in a manner appropriate to mitigate odour impacts. Given the short journey, there is concern that there could be less inclination to take the appropriate actions that ensure manure is transported securely.

Storage

- Concern that the proposal requires the input and output materials to be stored on site in concentrated silos that are not airtight and concerned that the proposed clamp would not always be open to the air momentarily.
- Concern that the lagoons (for the storage of liquid digestate and surface water) could create odour. Questioned whether the covers over the lagoons are 100% odour leakage proof.
- Questioned how long waste would be stored on site for before being processed and whether there could be a backlog under certain circumstances. Concern that material could decompose on site creating odour.

- Concern that there would be open slurry pits containing cow, chicken manure and waste.

Spreading of Digestate

- Concern the spreading of digestate would cause odour which would be experienced 24/7.

Odour Mitigation

- Concerns regarding the amount of odour mitigation proposed.
- Concerns that, even if all precautions are taken to alleviate odour, that these would not be 100% successful.
- Should permission be granted, questioned what guarantees are in place that mitigation measures would be adhered to, or in later years that the processes put in place to combat odours would not slip.
- Questioned why the poultry manure could not be stored in a negative air pressure environment rather than lagoons with a cover.
- Concern that storage of feedstock would not be airtight and would cause odour.
- Questioned how Hydrogen Sulphide (H₂S) would be managed, measured and what would be done if H₂S levels from the proposed development are unacceptable if permitted. Concern that H₂S can be smelled occasionally for a small number of days per year.

Qualitative Odour Risk Assessment, Ref: 93745.566879, dated June 2023

- Outlined paragraph 5.3.3 of the report, which references the prevailing wind direction at the site is from the south-south-west through to the west. Concern this means that any odours released from the site will likely be noticed over the new housing at Hursley Park and the Great Bowden.
- Concern that the information seems to suggest there is only marginal difference in the percentage of winds coming from the north/north east to that coming from the south/south west which would suggest that the potential for receptors to the south west of the site could be impacted more frequent than anticipated and therefore the potential impact could be more than the 'negligible' as the report concludes.
- Concern regarding the use of Wittering Observation Station in calculating prevailing meteorological conditions. Outlined Market Bosworth Observation station a few kms further from the site could be more reflective of the east-midlands/Leicestershire conditions. Argue that using Market Bosworth data, or averaging with Wittering, would provide more accurate results. Concern the report's reliance on meteorological data from Wittering (Section 5.3.1) does not account for local factors that may significantly impact odour dispersion and that

more localised monitoring would be necessary to provide an accurate understanding of the potential odour impact on nearby sensitive properties.

- Concern that data from 2022 was used from Wittering rather data from 2023. Concern data from 2022 would provide more favourable results.
- Concern that paragraphs 5.4.2 and 5.4.3 only consider the feedstock as an odour source, excluding any direct release of odours from other elements of the process, including ammonia. Concerned that based on information from the operations of other plants, this seems imprudent, and those releases could be categorised as having a 'large' odour potential, noting that some parts of the process will be 'open to the air momentarily'.
- Concern that the poultry manure may not be mostly fed into the sealed process on the same day (as per paragraph 5.4.4) unless this becomes a condition of planning condition. Concern there would not be immediate processing of the poultry manure.
- Questioned how the sensitivity of the proposed users of the subject site is envisaged to be 'high', but the report has given a 'negligible effect' for odour exposure for those residential dwellings nearby.
- Concern that, as per paragraph 1.2.6, the report is incorrect to suggest that agricultural odours are likely to be characteristics of the wider area, especially of this scale. Outlined it would still be a legitimate concern regarding the proposal exacerbating odours.
- Concern that, as per paragraph 5.3.4, the distance between the closest existing sensitive residential receptors is closer than the stated 150m. Concern this would alter the pathway effectiveness to the nearest receptor as highly effective, rather than ineffective, as per Table D2.
- Concern that, as per Table 3, given part of the feedstock is poultry manure the odour benchmark level used should be classed as 'most offensive odours', rather than moderately offensive odours.
- Concern the report classifies the odour as 'most offensive' (paragraph 3.2.24) but the risk assessment section (paragraph 5.4.2) classifies the odour as 'moderately offensive', which seems inconsistent.
- Concerned the report does not account for the potential of odour from the proposed lagoons, disposal of by-products, and other developments within the area.
- Concern that the report does not consider worst-case scenarios such as mechanical breakdowns, spills, or issues with delivery vehicles.
- Concern the report's assessment of odour pathways (paragraph 5.4.6- 5.4.8) is based on wind speeds, despite acknowledging that odour episodes are more likely to occur in stable atmospheric conditions with low wind speeds (paragraph 5.3.6). Concern that the pathway assessment may not accurately reflect the worst-case scenarios for odour dispersion, particularly during calmer weather.

- Concerned the odour modelling employed might not accurately represent the true extent of odour dispersion and impact on surrounding areas and is based on a best-case scenario.
- Concern that no sensitivity tests have been undertaken as part of the report.
- Concern the report was not conducted by an independent organisation.
- Concern that prevailing wind would not adequately mitigate potential emissions generated from the proposed development. The wind factor considered in the application suggests that the prevailing wind would blow any odours away from Great Bowden in a northerly direction. There are concerns that this contradicts the UK Government definition of prevailing wind i.e. direction varies between south-south-west and north-west, with north-easterly winds increasing in late winter and spring. Concern emissions would be blown southwards.
- Concern the conclusions that the pathway of odours to a populated area is 'ineffective' might be inaccurate. Based on only assessing the feedstock as producing odour of a 'medium' rating, the report conclusion when combined with an 'ineffective' pathway is 'negligible'. Concerns that inaccurate categorisations have been attributed to the odour and the odour pathway, which means if reassessed the overall risk and adverse effect on neighbouring populations could be higher.
- Concern that odour would spread to villages/towns other than Great Bowden through, for example, shifts in prevailing winds.

Ecology and Local Environment

- Concern the proposed development could degrade the natural local environment and ecosystems, including habitats of local species along Welham Lane.
- Concern regarding the potential impact on local livestock.
- Concern that Barn Owls and bats have been observed in this area.
- Concern the brick buildings on the site could house bats and birds.
- Concern spores from rotting straw cause lung disease in birds (aspergillosis).
- Concern regarding the removal of ecological assets which contribute to the site's character.
- Concern the application has not been supported with a Tree Survey, Arboricultural Impact Assessment, and a Method Statement, particularly assessing the potential impact on mature trees during construction.

Great Bowden Borrow Pit SSSI

- Concern regarding the potential impacts of the proposed development on the Great Bowden Borrow Pit SSSI just over 800m west of the site, particularly in relation to the release of ammonia.

Hursley Park Country Park

- Concern regarding the potential impacts on the Hursley Park Country Park situated approximately 200 metres from the site. Outlined The park has establishing wildflower meadows, native trees / hedgerows and provides an important habitat for multiple species that have been identified as priorities within the Leicester, Leicestershire and Rutland Biodiversity Action Plan. Outlined there are bird and bat boxes, and a wetland area within the park being created for Great Crested Newts.
- Concern that ammonia released from the proposed development would increase soil fertility/nitrogen levels and negatively impact the wildflower meadows' natural ecosystems they support. Outlined these wildflower meadows were a planning condition / Section 106 commitment and the restoration of them was partly grant funded by Leicestershire County Council.
- Concerned that many of the current and future recreational users of Hursley Park Country Park would have their amenity compromised by the increase in emission to air as a result of the proposed development.
- Concern that minimal, mainly desktop, surveys that have been conducted to date which we could underestimate the impact on the country park.

Impact on nearby Ecological Projects

- Outlined a number of projects in the local area including Harborough Woodland Project, Haygates Farm, and James Alder reserve, amongst others under consideration / development in the area. Concerned the proposed development could negatively impact these projects.

Preliminary Ecological Appraisal, Rev: Version 1, dated March 2023

- Concern report recommendations have not been undertaken including, bat, reptile, and badger surveys, and Biodiversity Net Gain (BNG) assessment.
- Concerned there is a strong likelihood of bats inhabiting the trees and buildings on the proposed site.
- Concern the report does not rule out Great Crested Newts, as being on site. Concern that there are at least 8 other ponds within 500m of the application site (excluding the onsite pond) with no major barriers to dispersal which have not been surveyed. Concern GCN particularly favour clusters of multiple ponds, such as those that exist around the application site and the site itself provides suitable terrestrial foraging and sheltering habitat for GCN, and therefore, these ponds should be surveyed.
- Concern the report has ruled out potential impacts on otter, and that water vole are not considered to be a potential receptor. Concern that the ditches on site are hydrologically linked to the River Welland, located approximately 460m east of the site. Concern Otter and Water Vole are known to be present within the River Welland and there is the potential for indirect impacts on both species as a result of surface run-off and pollution during the construction phase and post-development. Concern this has not been accounted for within the report.

- Concern the report acknowledges that the Phase 1 Habitat Survey was undertaken outside of the optimal survey window (April to mid-October). Concern there is the potential for certain species, including notable and non-native invasive species, to be present which were not recorded at the time of survey.

Climate Change and Pollution

- Concerns regarding inadequate treatment and appropriate mitigation of liquid effluents generated as a byproduct of anaerobic digestion and facilities for staff onsite, and the associated potential for water pollution.
- Concern there would be pollution associated with the construction of the plant.
- Concern there is a water course adjacent to the site, which flows into the River Welland. Concern regarding the impact of any surface water runoff, most notably of spilled chicken manure, into this watercourse, which itself is lower and so at the mercy of gravity.
- Concern regarding the potential environmental impact from impurities of the process.
- Concern the proposal would contribute to climate change rather than mitigating such. Concern biomass plants emit more carbon dioxide than fossil fuels.
- Concern of spillage from the movement of maize, straw, chicken manure, and liquid/solid fertilizer. Concern this would be washed into ditches around this property which feed into the River Welland.
- Concern there would be leakages from lorries being unloaded.
- Concern the AD process relies on fossil fuels.
- Concern that only a small proportion of the poultry manure comes from within 32km and there is no mention of the distances the straw travels or what happens with the by-product at the end of process.
- Concern the neighbouring farm, houses and feeds pheasants for human consumption and concern that pollution generated from the proposal, for example ground spill from bund collapse or leaking pools and tanks, could contaminate these pheasants.
- Concern growing maize can lead to soil carbon loss, greater than the carbon offset of biogas. Concern the planting, growing and harvesting of maize relies on heavy farm machinery, mostly powered by fossil fuels.
- Concern no contamination report has been submitted, yet this is a site where one would be required.
- Concern there would be pollution associated with the increase in vehicle movements, particularly during maize harvesting, which would offset the benefit of the energy generated.
- Concern that the Qualitative Odour Risk Assessment, Ref: 93745.566879, dated June 2023, miscalculated the potential impact of road vehicle exhaust emissions. Section 5.2.1 states, "*The Transport Statement has estimated ten*

two-way Heavy Goods Vehicle (HGV) movement per day, associated with the Site". However, in the Transport Statement, Rev C, dated June 2023, table 5.2 HGV Traffic Forecasts, they state that a *"Typical Day will have 22 2-way HGV movements and Peak Day (30 times per year) will have 52 2-way HGV movements."* Concern that the Odour Risk Assessment has used somewhere between one half to one fifth of the actual traffic movements for their analysis.

- Concern that biomass plants are considered carbon-neutral because the carbon released during combustion is theoretically offset by the carbon absorbed by plants during their growth. Concern this would not be case as part of the proposed development, and it could potentially lead to Carbon Emissions.

Spreading of Digestate

- Concern that the solid and liquid digestate would be high in nitrates, phosphates, and ammonia which is then spread on the surrounding area and excessive use of fertiliser and pesticides could cause pollution via surface run-off, including into the nearby River Welland, impacting watercourse quality, stimulating algae growth and resulting in eutrophication
- Concern that the spreading of solid and liquid digestate could lead to the release of ammonia gas.
- Concern that improper handling of digestate or leaks from the digester tanks can lead to the contamination of water sources with pathogens, heavy metals, and other pollutants.
- Referenced an incident in 2019, where more than 10,000 fish were found floating in a river in Devon as a result of anaerobic digestate entering the watercourse.

Public Health

- Concern regarding the emission of air pollutants associated with biogas generation/combustion such as Carbon Dioxide, Nitrogen Oxides, Sulphuric Dioxides, Sulfuric odours, Hydrogen Sulphide, Carbon Monoxide, Ammonia, Mercury, and other trace components potentially such as carcinogens. Concerns regarding the potential impact on public health for example breathing, respiratory and cardiovascular problems, headaches, pulmonary paralysis, cancer and death.
- Concern that the proposed development could worsen existing health conditions (Asthma, COPD etc).
- Concern regarding potential unknown health issues arising from the proposed development.
- Concern regarding the impacts on the mental wellbeing of residents, having to stay indoors due to the increased traffic and odour.
- Concern regarding the potential negative impacts on residents' quality of life and enjoyment of the Great Bowden.

- Concern, if permitted, the proposal could impact people using and enjoying local clubs, sport teams, scouts, beavers, and recreation grounds, particularly during summer months.
- Concern the proposed development could impact the physical health of residents through the reduction in enjoyment of outdoor activities.
- Concerns regarding the proximity of the proposed plant to educational institutions. Concern that children would be more vulnerable to the potential odour and pollutants from the proposed development.
- Concern open water encourages wildfowl increasing the risk of AI (avian flu).
- Concerned the proposal could cause alkali rain over Great Bowden and Market Harborough.
- With reference to Section 3 of the Department for Energy Security & Net Zero report Biomass strategy 2023, concerned the proposal should be located well away from residential, academic and business premises where people might suffer from the reduced air quality.
- Concern there could be the spread of disease from poultry manure on site.
- Concern regarding the potential health risks associated with the spreading of digestate.
- Concern the existing buildings of the of the old mushroom farm are made of compressed corrugated asbestos. Concern, with the wind in a northerly or easterly direction, the surrounding area could be contaminated by asbestos dust.

Noise

- Concern regarding the 24-hour operation of the proposed development causing noise pollution, particularly at night from the pumps and compressors.
- Concerned that, whilst the anaerobic digestion process might be quiet, there would be noise generation processes involved with the generation of gas. Concern that the proposed development incorporates telehandlers, pumps, and industrial processing which are intrusive types of noise compared to current agricultural activities on site.
- Concern regarding noise impacts associated with the traffic generated by the proposal, such as reversing alarms. Concern that this would be exacerbated during maize harvesting where traffic generation would be highest.
- Concern regarding noise impacts associated with the loading and unloading of feedstock and digestate at the site.
- Concern regarding noise impacts associated with the construction phase.
- Concern regarding noise impacts associated with HGV movements generated by the proposed development.
- Concern that the proposed development would add to existing noise already experienced in the area.
- Concern of the impact of noise generated by the proposed development on passing horses.

- Concern that the surrounding area is generally quiet so noise from the proposal would be exacerbated.

BS4142:2014+A1:2019 Sound Assessment Report, Ref: 03776-130101, dated December 2023

- Concern that the operation sound is described as having "impulsivity" meaning it could attract attention.
- Concerns report states that there would be an increase in noise levels experienced at nearby residential properties as a result of the development. Concern that, during daytime hours, the report predicts noise levels reaching up to 41dB LAeq (page 22). This is an increase of +7dB above current background levels (page 24). BS4142 classifies a +5dB increase as an indication of "adverse impact", and anything above +10dB as "significant adverse impact." Concern, the expected noise increase falls in between these two categories, indicating there could be a noticeable and disruptive level of noise pollution generated.
- Concern that the report shows noise levels increasing by +3dB to 32dB LAeq. at night.
- Concern with the conclusion of the report (paragraph 6.4) that the operation of the site will likely generate a sound impact of around +5dB, which is adverse impact in BS4142 terms, but is less than significant adverse impact.
- Concern that information in relation to the effectiveness of the proposed acoustic enclosures and acoustic louvers as outlined by paragraph 3.12 has not been included.

Landscape and Visual Amenity

- Concern the proposed development would have a negative impact on a countryside location and surrounding landscape and character. Concern this would be an industrial facility on an agricultural site in open countryside.
- The site is located within the Welland Valley Landscape Character Area and contributes to the wider openness of the countryside setting. Concern there are numerous elevated viewpoints of the site in the surrounding area.
- Concern the proposed development falls within the Foxton to Great Bowden Slopes Landscape Character Area.
- Concern regarding the height of large industrial tanks, particularly those ranging from 5 to 10 meters in height.
- Concern regarding the 10.5m high flare stack.
- Concern the massing for the proposed buildings are too large.
- Concern there are no visualisations showing views of the proposed building heights from sensitive locations
- Concerned the current value of the site, through its verdancy and openness, owing to the lack of development within it, would be lost.

- Concern that, in cumulation with existing industrial development along Welham Road, the proposal would turn Welham Road and Lane into an industrial estate.
- Concern regarding the loss of sunlight/daylight to neighbouring properties, including rearing sheds and pens.
- Concern that the existing boundary planting isn't enough to screen the proposed development.
- Concern the proposal would be built on green belt land.
- Concern the proposal is within an Area of Outstanding Natural Beauty.
- Concern the whole area being considered a brown field site when less than half the area is brown field.

Design, Materials and Finishes

- Concern there are no material specifications provided within the application documents. Concern that drawings refer to 'double doors', 'green profile metal' or 'profile metal sheeting', with no detail as to the finish proposed or how this is in keeping with the landscape/local character.
- Concern the application form states that details relating to proposed materials & finishes are provided within the submitted plans and Design and Access Statement (DAS). Concern this is not accurate, and the 'DAS' is a planning statement and should be re-named as such.
- Concern that it would be difficult for judgment to be made on the quality and visual impact of the proposed design if materials and finishes are conditioned.

Flood Risk and Drainage

- Concern that, as per paragraph 5.17 of the Landscape and Visual Statement, Ref: 1551 1 LVS GP, dated June 2023, the application site and its immediate surroundings fall into Group 3, River Valley Floodplains, more specifically into 3A, Floodplain Valleys landscape character type.

Surface Water

- Concern that a large section of the site is undeveloped which allows rain to soak away. Concern this would be replaced almost entirely with buildings, structures and hard standing. Concern the proposal is unlikely to be able to capture all of the surface water during intense rain, increasing the risk of runoff to surrounding areas.
- Concern the sites raised topography would exacerbate surface water run-off.
- Concern the site's southern boundary is adjacent to a water course which could pose an increased risk to flooding from surface water.
- Concern that the rate at which the proposed scheme would utilise the collected rainwater has not been demonstrated.

- Concern that the surface water will collect in a Pond/Lake must have an outfall which isn't noted in the application.
- Concern that, during harvesting the soil gets very heavily compacted, therefore surface water cannot drain efficiently which contributes to flooding.

Drainage

- Concern the application has not accounted for how existing drainage would be improved to handle the treatment of effluent discharge from the site. Concern that there are no foul sewers in the area and if water will not be discharged to any sewers, it is likely that water would have to be exported to an off-site sewage works, therefore increasing HGV movements.
- Given the low-lying nature of the site, concerned the use of Sustainable Drainage Systems (SuDS) within the scheme limited to rain water harvesting and trapped drainage.
- Concern that no drainage strategy has been provided.

Flood Risk Assessment and Drainage Strategy, Ref: R-FRA-26925-01-0, dated October 2023

- Concerned that the green roof and pervious pavement SUDS techniques, as per paragraph 4.4.1, have not been considered further.
- Concern the report does not provide information about proposed mitigation for an extreme storm event exacerbated by climate change.
- Questioned paragraph 4.8 of the report. Concern with how drainage systems becoming overwhelmed could still allow for all overland flows to be captured for use within the AD Plant.

Heritage and Conservation

- Concern the proposed development could have a negative impact on the Great Bowden Conservation Area, for example through the reduction in air quality, increased traffic and noise generated by the proposal.
- Concern that an increase of HGVs travelling through Great Bowden could have a negative impact on listed buildings in the area.
- Concern the proposal could cause a reduction in funds available for the maintenance of historic buildings.

Light Pollution

- Concern that the proposed development could increase light pollution and is not covered within application. Concern that, in light of recommendations made within the submitted Preliminary Ecological Assessment, Version 1, dated March 2023 regarding lighting, no lighting plan provided as part of the application.

- Concern potential light pollution from site could impact the laying stock of the neighbouring farm. Laying stock are kept the other side of the fence and unnatural light disrupts their natural laying cycle.

Pests

- Concerned that the proposed development could lead to an increase in pests such as flies and rodents, particularly from the use of poultry manure.
- Concern that the application does not adequately address how pests would be controlled/mitigated, and if left untreated, could lead to health risks.

Use of Maize, Straw, and Poultry Manure

- Concern the proposal conflicts with government policy for food security and the waste hierarchy as the application would use maize grown specifically for use in the AD process rather than food, and straw as waste over other potential uses.
- Concern some biomass crops may require significant amounts of water for cultivation, leading to concerns about water scarcity and competition with other water-intensive activities.
- Concern the large-scale cultivation of crops for biomass production could lead to competition with food crops, potentially affecting food prices and availability. Concern it could result in changes in land use that impact biodiversity and natural ecosystems.
- Concern the sustainability of biomass power generation relies on the availability of sufficient feedstocks. Concern this could lead to overharvesting, deforestation, or unsustainable agricultural practices.
- Concern the poultry manure would be sourced from factory farmed poultry. Concern factory farms provide environment for pathogenic organisms to grow and approving this application would endorse the use of factory farms.
- Concern no information on whether pesticides would be used in the growth of maize and consideration of the potential impacts of such.

Risk of Accidents/Incidents

- Concern regarding the increased risk of accidents at the site, including fires, toxic spills, gas leaks and explosions. A number of notable incidents at other sites are provided, including in Oxfordshire in (2016 and 2023), Shropshire (2014), Avonmouth (2020) and Nottingham (2017).
- Concern regarding the health & safety risks associated with operating an anaerobic digestion facility.
- Reference made to an Environment Agency review of environmental incidents at AD Plants and associated sites between 2010 and 2018 (dated September 2019).
- Concern neighbouring property has 6 large propane tanks, two of which are situated a few metres away from the digester.

- Concern if there is a gas leak, the neighbouring buildings have open flame heaters.
- Concern the presence of methane leads to a higher risk of explosion.

Employees

- Concern that the application does not cover how waste generated by employees (two full time members of staff and delivery drivers) would be disposed of.
- Concern the proposed application would not provide any local employment opportunities.

Land Ownership

- Concern the northern and eastern boundary as outlined on the site plan are incorrect as the hedge and ditch on these boundaries are owned by the neighbouring property. Concern the neighbours had not been notified of this.

Concerns with Application Form

Trees and Hedges

- Concern there are trees and hedges on land adjacent to the proposed development, not 'no' as noted on the application form.

Assessment of Flood Risk

- Concern there are watercourses within 20m of the development running along the site boundary, not 'no' as noted on the application.

Biodiversity and Geological Conservation

- Concern applicant states that 'no priority species are on the site', however The Preliminary Ecology Appraisal confirms that the site provides a reasonable likelihood of sustaining reptiles, bats, and badgers.
- Concern the applicant states that there are no designated sites on or near to the site. Concern the Great Bowden Borrowpit SSSI is located under 0.65km.

All Types of Development: Non-Residential Floorspace

- Concern the form does not include any information pertaining to the existing floorspace of the farm buildings/bungalow.

Industrial or Commercial Processes and Machinery

- Concern the applicant states that the proposal does not involve the carrying out of industrial or commercial activities or processes and this a waste management development. Concern the proposal is not a waste management development but

a commercial activity for the production of biomass from the use of the anaerobic digestion of mainly a harvest feedstock of maize and straw. Poultry manure only represents 22.5% of the feedstock.

Hazardous Substances

- Concern the application form states that the proposal would not involve the use or storage of Hazardous Substances. Concerned the production, storage, and transportation of carbon dioxide would be considered a hazardous substance.

Reference to Other Anaerobic Digestion Facilities

- Comparisons were drawn to the impacts caused by a variety of anaerobic digestion facilities across England which had been reported in the news. Pertinent issues included odour, traffic, noise, and environmental impacts. Comparisons were also drawn of a number of other anaerobic digestion facilities across England which were refused for a number of reasons including traffic, odour and visual impacts.
- Multiple references made to the noise and odour experienced in reference to the Rothwell Plant in Northamptonshire.
- Concerns regarding the contradiction between the odour reported by communities near existing anaerobic digestion plants and the assurances made in planning applications, which often suggest minimal impact in this regard. Concern operators would not alleviate the problem.

Socio-Economic Impacts

- Concern the proposal would impose a burden on public cost of living through subsidies camouflaged under the levy 'Green Gas Support Scheme' Concern these are paid for by a tax placed silently on energy bills.
- Concerned the proposal, if permitted, would economically impact surrounding farms.
- Concerned the proposal, if permitted, would impact local property values.
- Concerned the proposal, if permitted, would reduce the use of local businesses given noise, odour, traffic etc
- Concerned the proposal, if permitted, would impact local tourism.
- Concern the proposal could negatively impact investment into the area.
- Concern the proposal would destroy the social fabric of the surrounding area and offers no value to the local community

Conflict with National and Local Policy

- Many of the representations received raised policy concerns based on the abovementioned considerations. These have been included within the policy

section of the report and are assessed within the assessment section of the report.

- Outlined a new footnote has been added to the NPPF, "*The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development.*" Suggested a follow-up statement should be required confirming how the loss of this agricultural land aligns with the revised National Framework with relevant evidence.
- Reference was made to a 'Policy EMP2 (3)' of the Great Bowden Neighbourhood Plan. The points outlined within Policy EMP2 have been considered within the report however there is no reference to '3' within this policy.

National Grid Connection and Compound

- Concern as to how the plant would connect to the National Gas mains. Concern Welham Lane would need to be dug up to carry the connecting gas line.
- Concern that no reports are for the National Grid Compound area including a biodiversity report, and historic/archaeological impact assessment.

Other Considerations/Comments

- Concerned the residential dwelling on site would need planning permission to change its use to industrial use. Concerned the eastern portion of the site forms two distinct grade 3 agricultural fields separated by a farm fence which would require planning permission to change its use.
- Concerned the proposal appears to involve demolition of the existing farm buildings/sheds and changes to the topography of the site through the installation of two large earth bunds. Concern details of demolition (and attempts to retain) the existing farm buildings, or where the existing buildings are in relation to the development are unclear. Concern the proposal does not to consider any of the current farm buildings or floorplans and would be demolished without assessment.
- Questioned why the application is with the County for decision, and not in consideration by Harborough District Council, as this appears to be a commercial enterprise primarily for generating gas from straw and other commercial feedstocks, with only a smaller proportion being for the processing of waste.
- Concern the proposal, if permitted, could negatively impact growth plans for the housing in the area.
- Concern the proposed process buildings are not fully accessible.
- Highlighted a previous AD Facility refused by Leicestershire County Council (application reference: 2019/0419/06 (2019/CM/0066/LCC)).
- Concern data cannot categorically prove that real life impacts from this application would be minimal.

- Raised recent precedence of a planning application for a motocross park off the A6 in Kegworth, Leicestershire which is allegedly set to be rejected by North West Leicestershire District Council because of safety fears of traffic turning on and off a busy bypass.
- Concern no other development like the proposal has been approved to be built as close to a residential area anywhere else in the UK.
- Concern the proposal would result in the loss of Grade 3 agricultural land at the site.
- Concerned if permitted, would set a precedent and that future expansion at the site would be justified on the grounds that there's already an operational site.
- Concern that the proposed inputs would change during the life of development, specific concern the plant would process more odorous input such as food waste or human waste.
- Confusion raised as to the volume of feedstock to be used in the proposal. The Application Form refers to '9000' tonnes, the Design and Access Statement '37,000' tonnes, and the Transport Assessment '100,000' tonnes.
- Reiterated that there would be 'better locations' for the proposed development.
- Reiterated a preference for alternative green technologies (such as wind and solar) at the site. Concern biomass power plants may have lower energy conversion efficiencies compared to some other renewable energy sources.
- Concern the 7MW of energy and two new jobs that would be created would not outweigh the negatives.
- Concern people would be forced to move because of the plant, and would stop people moving to, the area.
- Concern biomass fuel is often bulky and has a lower energy density compared to fossil fuels. Concern this could pose challenges for storage, transportation, and handling, affecting the overall efficiency and economic viability of the proposal.
- Concern, if permitted, the proposal could be influenced by fluctuations in biomass feedstock prices, making it challenging to maintain consistent energy costs.
- Concern many biomass projects depend on government subsidies and incentives, and changes in policy or the expiration of support mechanisms could impact the long term sustainability of the proposal.
- Concern over applicant name, company, funding and motivation.
- Concern that residents pay a premium to live in the area.
- Concern regarding the potential impact on nearby allotments.
- Comments from the Market Harborough Model Aero Club (MHMAC). MHMAC's flying field is located in the field to the west of the Welham Bush Poultry Farm. MHMAC note that the proposed NTS connection is to be sited next to the Poultry Farm. It appears the height of the cabin and any other structural items to be placed in the NTS connection boundary will not exceed 3metres above ground level. This is unlikely to impact on our model flying as there is also a hedge and small trees of a similar height at the boundary of our flying field. Ask as part of the decision-making process, decision makers: Ensure that the NTS facility is designed to be

safe for all variants of model aircraft and helicopters to overfly; Be aware there is very small possibility the NTS facility could be struck by a model aircraft or helicopter in the event of a fault occurring; Provide MHMAC with an agreed method to recover a model aircraft or helicopter should it end up in the NTS compound. Recovery from the NTS compound should have no penalty or cost to MHMAC members.

- Objection from Green Party Cllr, “I acknowledge the urgent need to move away from fossil fuels. The Green Party does not recognise Biogas as a source ‘Green Energy’”.
- Concerned that an approval would be conditioned, going against best practice.
- Idea that there is financial benefit to the council from the proposal. “*A back handed contribution to the local government and council to improve their coffers*”.
- Claim private commercial interests which will not benefit local residents being prioritised.

This page is intentionally left blank