

## **APPENDIX C – PUBLIC CONSULTATION (AUGUST 2024)**

### **SUMMARY OF RESPONSES**

Representations raised as part of the second consultation generally referenced those concerns raised as part of earlier representations had not been adequately addressed, often referring to earlier comments. Points repeated from the first consultation period are not repeated again. However, comments relating to the submission of additional information, or comments not covered within initial representations, are set out below:

#### **Highways and Traffic**

- Concerns that the arrival times of delivery vehicles cannot be guaranteed, so large number of vehicles trying to access the site at certain times of the day would impact the local road network extending to Market Harborough.
- Emphasised concerns regarding the poor visibility at the A6 junction and the potential impacts this could have on slow-moving vehicles entering and egressing from/onto.
- Full Transport Assessment, in line with the Leicestershire Highway Design Guide, should be commissioned to ensure this would be a safe development.
- Concern that nothing has been submitted to quantify the amount of non-traffic users that use Welham Lane. This is who will have their safety compromised by this proposal.
- Concern that the road is still too narrow and does not have the required distance according to the highway code to pass horses safely.
- Concerned as to whether the LHA had considered the A6 access.
- Concerns regarding HGV traffic going through Dingley and the potential impacts on the narrow roads of the village.
- Concern the statement by Highways that Welham Lane is a no-through road may be technically correct but gives an incorrect picture of what is involved at this site. Welham Lane stops at Welham, but it also provides direct access to the A6. It is used extensively by not only local people but companies including the use of tractors, vans and lorries.

#### **Proposed Mitigation Measures**

- Concerns that the proposed passing point on Welham Lane is inadequate and would not fundamentally mitigate the increase of HGV traffic on unsuitable roads and increase of slow-moving vehicles entering and egressing from/onto the A6 at this junction.
- Concerns there is not enough space to widen Welham Lane to allow two HGVs to pass, and even if there was, there would not be sufficient safe space such as pavements for vulnerable users (pedestrians, cyclists, horse riders, dogs etc).

- Concerns that the proposed widening of Welham Lane would make the situation more dangerous due to reducing the caution and uncertainty for drivers.
- Concerns there is no safe way to allow the volume of HGVs proposed in close proximity to vulnerable users of Welham Lane.
- Concerns that the application continues to not make reference to National Cycle Network 64. Concerns the application fails to acknowledge the dangers posed to cyclists by the increased HGV traffic and does not propose adequate measures to mitigate these risks such as a cycle route, fully segregated from HGV traffic, with cyclists having clear priority.
- Concerns that the submitted 'Traffic Plan' is inadequate, particularly in managing HGV traffic.

### **Odour**

- Concerns that there has been no assessment of the odours from waste being transported to, unloaded, and stored on-site prior to processing (irrespective of processing methods used).
- Concerns that any delay to processing caused by the plant being temporarily out of action could increase odour impacts
- Concerns that there has been no assessment of the odour dispersing from the open areas in low wind conditions.
- The documentation has not properly considered odour issues at various times of the day.
- Concern that the applicant has cherry-picked assessment methods and data to suit its case, which is not in accordance with guidance issued by the Institute of Air Quality Management.
- Suggested a council officer should make an unannounced visit to an AD plant and use their own senses to comprehend the odour related impacts.
- Lived experiences are at odds with the data provided.
- In reference to an energy from waste site utilising chicken manure, outlined the scheme is required to store chicken manure under negative pressure to mitigate odour impacts and has questioned why this is not a requirement or this application.
- Concern that the wind blows regularly towards the south, in the direction of many residential receptors.
- Concern that statements provided within the application that there would be no odour because the digesters are covered or sealed are inaccurate.
- Concerns that the application admits that there will be a smell similar to a farmer spreading on their fields, because you 'have to open them or uncover them to add raw material and remove waste', thereby releasing noxious smells into the environment.

### **Public Health**

- Concerns the application fails to properly address the potential impact of bioaerosols - tiny particles released during the composting or digestion process. Concerns that these particles can travel significant distances and could pose health risks to nearby residents. Given the proximity of residential properties to the proposed site, an assessment of bioaerosol emissions and their potential health impacts should be required.
- Concerns that, anaerobic digestion plants, if not properly managed, can cause health issues such as headaches, nausea, and respiratory problems in nearby populations. An independent and comprehensive Health Impact Assessment (HIA) should be required.
- Concern that the omissions of an assessment of bioaerosols and a HIA could endanger public health.
- Concerned the air quality and odour assessments provided do not demonstrate that the proposal would not cause unacceptable adverse impacts on air quality, community health, odours and air pollution. This is given the omission of sensitive receptors and underestimation of emissions within these reports.

### **Ecology and Local Environment**

- Concern regarding Hursley Park Country Park, situated approximately 200m from the site. The park is in the process of being designated as a Local Wildlife Site by Leicestershire County Council and is due to be nominated as a Local Green Space in the next version of the neighbourhood plan.
- Concern that local area has been identified by Leicestershire and Rutland Wildlife Trust as a zone for potential nature recovery. There are multiple assets in the area including Hursley Park, The James Adler Reserve, the River Welland, Grand Union Canal, Great Bowden Borrowpit SSSI, disused railway line, multiple footpaths and the recreation asset of Welham Lane. Concerned the proposed development would put this at risk. Outlined the Rewilding Great Bowden Leicestershire & Rutland Wildlife Trust Document.
- Concern Harborough District Council and Leicestershire & Rutland Wildlife Trust have recently purchased 3 plots of land surrounding the proposed plant as part of a £1.8m rewilding plan for a green corridor also connecting the James Adler Nature Reserve, Hursley Park Country Park.
- Concern that not all of the further recommended survey outlined within the preliminary ecological appraisal conducted by Archer Ecology (March 2023) had been completed/submitted.
- Concern that potential impacts to the SSSI continue to be underestimated or incorrectly assessed.
- Concern that the submitted Biodiversity Metric does not meet the 10% BNG target, and in fact the development would result in a 41.22% reduction in biodiversity at the site (taking account of habitats only, not species).
- Concern that the Biodiversity Metric has been weighted inaccurately, and that the 41.22% loss reported could be higher. Hedgerows are described within as,

"not appearing in local strategy/no local strategy", whereas hedgerows are identified as priority habitats in the Leicestershire & Rutland Biodiversity Action Plan dating from 2016. Noted Natural England's advice is to use existing Biodiversity Action Plans for the local area in the absence of a completed Local Nature Recovery Strategy.

### **Pollution**

- Concerns regarding the spillage of untreated materials on the approach roads, and on site being washed away into local waterways.

### **Heritage and Conservation**

- Concern that the presence of nearby heritage assets and conservation area continues to be overlooked.

### **Landscape and Visual Impacts**

- Concerns that the proposed development would be visible from nearby gardens.

### **Pests**

- Concerned the current application does not adequately address how pests would be controlled.

### **New residential development**

- Concern that Harborough District Council are currently looking to bring forward land within 500m of the proposed development for up to 100 homes.
- Concern an application has been submitted which would place 8 homes almost directly adjacent to the proposed plant (ref: 25/00517/OUT).

### **Conflict with National and Local Policy**

- Continued to outline conflicts with national and local policy.
- Reference was made to a 'Policy DM9: Health and Amenity' of the LMWLP, whilst this specific policy does not exist, health and amenity is considered by Policy DM2 which has been considered.
- Reference was made to a 'Policy DM8: Transportation by Road' of the LMWLP, whilst this specific policy does not exist, transportation by road is considered by Policy DM9 which has been considered.

### **Planning Conditions**

- Requested, if permitted, the following condition: "A monthly review of operations with the biogas plant operators, attended by representatives of the Environment Agency, Hursley Park residents, Great Bowden residents and the Parish council."

### **Other Considerations**

- Confusion raised in relation to the applicant's response to the LLFA's request for clarification of the arrangements for effluent discharge. The applicant's response is, *"There is no requirement for a treatment effluent discharge associated with the proposals. The process takes in water and generates product, with any digestate created being fed back into the system. As there are no by-products of the process, nothing leaves site, and this arrangement does not change."* Concern that, given the 40,000 tonnes of various inputs, plus water including effluent discharge, would be taken in by the site each year and that, *"..nothing leaves site.."* that *"..digestate is fed back into the system.."* and that *"there are no by-products of the process"*, there is concern this would lead to a large build-up of digestate at the site.
- Concern those residents within 400m of the proposed site were not approached by the developer on a personal basis.
- Questioned, if permitted, what would happen if the site was not appropriately managed? Concern that fines would not solve the potential issues caused.
- Concern that, if permitted, conditions would not be complied with.
- Concern the 're-submission' was a deliberate tactic to sneak the application through the process and claim there was limited local objections.

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