

ANNEX B

Freedom of Information request and response from Suffolk County Council

From: Chris Edwards <chrisedwards@suffolkonline.net>

Sent: 03 May 2019 11:39

To: Information Management Services

<information.Management@suffolk.gov.uk>

Cc: Guy McGregor <guy.mcgregor@suffolk.gov.uk>

Subject: FOI request planning consent PL\0279\15 and

Dear FOI Team

I wish to know the answers to the following questions. My requests refer to the attached committee report and plan

1. The report states

2)Availability of Planning Documents

A copy of this permission, including all documents hereby approved and any other documents subsequently approved in accordance with any conditions of this permission, shall be kept available for inspection on the site for the life of the development.

Q1: Are all these documents including block plan C283-101A available for inspection on site as required?

2. The report states

7) Noise Limits

Noise from all components associated with the anaerobic digestion plant must not exceed 35 dB LAeq at each of the positions indicated on the Plan entitled 'MS/3892/15 Barley Brigg Farm AD – Proposed Noise monitoring positions'.

Q2: How frequently are these noise limits monitored and at what times of day and night?

Q3: please supply the results of the monitoring data for the last 12 months

3. The report states

Waste Capacity and Origins

15) Within any 12 month period only the following feedstocks shall be brought into and processed at the site:

- a) energy crops (4500 tonnes);
- b) sugar beet pulp (4000 tonnes);
- c) chicken litter (2000 tonnes);
- d) apple pulp (2500 tonnes);
- e) herbs (2000 tonnes);
- f) on site slurry; and
- g) **on site digestate.**

The operator shall keep a record of all imported material, which shall be made available to the Waste Planning Authority upon request.

Reason: To ensure whilst meeting the forecast waste arisings, the waste is treated as close as possible to its source, in accordance with Policy WCS2 of the Waste Core Strategy Adopted Version 2011, setting out general considerations relevant to all waste management facilities and which are required in order to make the development acceptable.

Q4: How often does SCC inspect these records to ensure planning compliance?

Q5: What were the last annually accumulated total recorded weights of each of the above input fuels (a-f) to the digester?

Q7: What was the last annually cumulative total weight of digestate (g) output removed from the site? (using same dates as Q6)

Q6: How were they verified evidentially?

3. The report states that approved drawing -C283 -101A block plan is one of the consented scheme drawings. It contains a weighbridge.

Q6: when did SCC last inspect the weighbridge to ensure it is working properly?

Q7: What was the result of the inspection?

Kind regards

Chris Edwards

chrisedwards@suffolkonline.net

From: Freedom of Information <FOI@suffolk.gov.uk>

Sent: 10 June 2019 17:41

To: Chris Edwards <chrisedwards@suffolkonline.net>

Subject: 17934 – Information Request – Response

INFORMATION REQUEST RESPONSE

Thank you for your request for information, reference number 17934. Please quote this in any future correspondence you may have with us.

Please find attached a copy of our response to the information you requested.

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Please remember to quote the reference number above in any future communications.

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely,

Gillian

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Suffolk County Council
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Environmental Information Regulations – Response – 17934

I wish to know the answers to the following questions. My requests refer to the attached committee report and plan

1. *The report states*

2) *Availability of Planning Documents*

A copy of this permission, including all documents hereby approved and any other documents subsequently approved in accordance with any conditions of this permission, shall be kept available for inspection on the site for the life of the development.

Q1: Are all these documents including block plan C283-101A available for inspection on site as required?

1. yes

2. *The report states*

7) *Noise Limits*

Noise from all components associated with the anaerobic digestion plant must not exceed 35 dB LAeq at each of the positions indicated on the Plan entitled 'MS/3892/15 Barley Brigg Farm AD – Proposed Noise monitoring positions'.

Q2: How frequently are these noise limits monitored and at what times of day and night?

2. There is no regular noise monitoring, noise is monitored if complaints are received regarding a specific noise issue. The noise would be monitored at the time appropriate to the complaint.

Q3: please supply the results of the monitoring data for the last 12 months

3. No monitoring has taken place in the last 12 months.

3. *The report states*

Waste Capacity and Origins

15) *Within any 12 month period only the following feedstocks shall be brought into and processed at the site:*

- a) *energy crops (4500 tonnes);*
- b) *sugar beet pulp (4000 tonnes);*
- c) *chicken litter (2000 tonnes);*
- d) *apple pulp (2500 tonnes);*
- e) *herbs (2000 tonnes);*
- f) *on site slurry; and*
- g) ***on site digestate.***

The operator shall keep a record of all imported material, which shall be made available to the Waste Planning Authority upon request.

Reason: To ensure whilst meeting the forecast waste arisings, the waste is treated as close as possible to its source, in accordance with Policy WCS2 of the Waste Core Strategy Adopted Version 2011, setting out general considerations relevant to all waste management facilities and which are required in order to make the development acceptable.

Q4: How often does SCC inspect these records to ensure planning compliance?

4. The site is visited twice a year, when possible, and feed stocks are discussed.

Q5: What were the last annually accumulated total recorded weights of each of the above input fuels (a-f) to the digester?

Tonnage Actually brought in and processes – 15642 tonnes

5. On site slurries – 9400 tonnes

Q7: What was the last annually cumulative total weight of digestate (g) output removed from the site? (using same dates as Q6)

Solid digestate – 3,500 tonnes

6. Liquid digestate – 16,500 tonnes

Q6: How were they verified evidentially?

Figures were supplied by the site manager.

7. 3. The report states that approved drawing -C283 -101A block plan is one of the consented scheme drawings. It contains a weighbridge.

Q6: when did SCC last inspect the weighbridge to ensure it is working properly?

8. The weighbridge has always been working during annual inspections.

Q7: What was the result of the inspection?

9. The weighbridge has always been working during annual inspections.

Development Control Committee

Report Title:	Anaerobic digestion plant, associated infrastructure and use of existing agricultural lagoons: Barley Brigg Farm, Laxfield Road, Stradbroke, Suffolk IP21 5NQ
Meeting Date:	20 January 2016
Lead Councillor(s):	Councillor Peter Beer
Local Councillor(s):	Councillor Guy McGregor
Director:	Geoff Dobson, Director of Resource Management
Assistant Director or Head of Service:	John Pitchford, Head of Planning
Author:	Sean Cunniffe, Planning Officer; Telephone: 01473 265903

Brief summary of report

10. This application seeks to gain consent (part retrospective) for an anaerobic digestion (AD) plant and associated infrastructure at Barley Brigg Farm near Stradbroke. The development is partially constructed and operational.
11. Consent was granted in 2013 by Mid Suffolk District Council (ref: 3219/12) for an AD facility. However, the 'as built' development differs materially in nature from the originally consented proposal meaning that a new planning consent is required. As the feedstock sources have been amended to include waste, this means that the proposal now falls under the planning remit of Suffolk County Council (SCC) as the Waste Planning Authority.
12. 11 objections have been received relating to issues of adverse impacts upon residential amenity.
13. Objections have been received from Stradbroke Parish Council and Wilby Parish Council, who consider the development as adversely impacting on the surrounding area, visually, and in respect of increased traffic and noise pollution.
14. No objections have been raised by Mid Suffolk District Council or Statutory Consultees.
15. The application is supported by noise, air quality, landscape and visual, flood risk and transport assessments.
16. Councillors are encouraged to view the application which is available in the Councillors Area or online at:

<https://secure.suffolkecc.gov.uk/ePlanning/loadFullDetails.do?aplId=21059>

Action recommended

- | |
|---|
| <ol style="list-style-type: none"> 17. That planning permission be granted subject to the following conditions: <ol style="list-style-type: none"> 1) The development uses and associated activities hereby approved shall only be carried |
|---|

out in accordance with:

- a) The application form dated 20-10-2015 and following Planning Application Supporting Statements:
 - i) 'Landscape and Visual Impact Assessment' by The Landscape Partnership dated September 2015
 - ii) 'Landscape and Visual Impact Assessment Appendix 2 Figures' by The Landscape Partnership dated September 2015
 - iii) Noise Impact Assessment by Sharps Acoustics LLP dated 28 August 2015
 - iv) Air Quality Impact Assessment by Earthcare Technical dated October 2015
 - v) Flood Risk Assessment by Amazi dated 13 October 2015
 - vi) Planning, Design and Access Statement Supporting a Planning Application for an Anaerobic Digestion Plant dated October 2015
 - vii) Brief Transport Statement by the HTTC Ltd dated 21 Oct 2015
 - viii) Brief Transport Statement by the HTTC Ltd – Supplementary Information dated 07 December 2015
 - ix) Kingspan Klargester: Biodisc – High performance sewage treatment plant for domestic applications (BA model)
- b) The approved plans Nos:
 - i) E399/LP1 entitled Location Plan dated September 2015
 - ii) E399/SP1 entitled Site Plan dated September 2015
 - iii) E399/PD1 entitled Anaerobic Digestion Process Diagram dated September 2015
 - iv) EDS-PR0169-0005 entitled CHP Layout Plan View
 - v) EDS-PR0169-0005 entitled CHP Layout Elevations A, B D and E
 - vi) EDS-PR0169-0005 entitled CHP Layout Elevations C and F
 - vii) EDS-PR0169-0005 entitled CHP Layout Isometric Views
 - viii) CLS-C283-101 Rev A entitled General Layout
 - ix) CLS-C283-101 Rev A entitled General Layout 2 of 2
 - x) CLS-C283-102 Rev A entitled Sections and Elevations
 - xi) CLS-C283-003 Section Through Clamp Walls
 - xii) 866-05bp003b entitled Separation, Gas Condensate Pit Fondation Pump-Mazerator and 2nd Pump
 - xiii) BARLEYBRIGG-02 entitled Elevations – Indicative
 - xiv) 866-05bp001c entitled Digestor, Slurry Store
 - xv) WTMR1.0 entitled WTMR1.0 Links

xvi) MS/3892/15 Barley Brigg Farm AD – Proposed Noise monitoring positions

Reason: To ensure that new development is completed in accordance with submitted details.

Availability of Planning Documents

- 2) A copy of this permission, including all documents hereby approved and any other documents subsequently approved in accordance with any conditions of this permission, shall be kept available for inspection on the site for the life of the development.

Reason: To inform both site operators and visiting persons of the site operational responsibilities in accordance with Policy WDM2 of the Suffolk Waste Core Strategy Adopted 2011, setting out general considerations relevant to all waste management facilities and which are required in order to make the development acceptable.

Soft Landscaping

- 3) Within one month of the date of this consent, details of soft landscape works, and implementation programme, shall be submitted to and approved in writing by the Waste Planning Authority.

Soft landscaping shall include:

- a) planting plans which provides for native tree and shrub planting;
- b) written specifications for remedial works and preparation of soil particularly to remove compaction (including cultivation and other operations associated with plant and grass establishment);
- c) schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate and implementation programme; and
- d) implementation timescale.

All landscaping works shall be carried out in accordance with the approved details and timescale.

Reason: To ensure the site is properly planted and in the interests of visual amenity and in accordance with WDM2 and WDM19 of the Suffolk Waste Core Strategy (adopted 2011) and CS5 of the Mid Suffolk Core Strategy.

Implementation of Landscaping

- 4) All planting shall be maintained for five years after initial planting has been completed by:
- a) keeping the new planting free from competing grass and weeds. Where herbicides are used, they must be an appropriate 'translocated' type;
 - b) replacing any trees and shrubs on a one to one basis each year which are substantially damaged, seriously diseased or dead, with plants of a similar species and size;
 - c) checking, adjusting and repairing all stakes, ties, shelters or fencing used in the scheme; and
 - d) remaining tree protection no later than five years after planting of any section.

Reason: To ensure the site is properly planted and in the interests of visual amenity and in accordance with NPPF Section 11, WDM2 and WDM19 of the Suffolk Waste Core

Lighting

- 5) A scheme of lighting shall be submitted to and approved in writing by the Waste Planning Authority within two months of consent, including: details of any external illumination, including the number, height and location of any lighting columns and/or building mounted lighting.

Reason: In the interests of the residential amenity and biodiversity and in accordance with WDM2 and WDM19 of the Suffolk Waste Core Strategy (adopted 2011) and CS5 of the Mid Suffolk Core Strategy.

Noise Monitoring

- 6) Prior to the commissioning of the anaerobic digester unit to process waste, attended noise monitoring must be completed and the results submitted to and approved in writing by the Waste Planning Authority. The noise survey must be undertaken during the night with measurements at the three positions identified the plan entitled 'MS/3892/15 Barley Brigg Farm AD – Proposed Noise monitoring positions'.

Reason: To protect the amenity of neighbouring occupiers having regard to Policy WDM2 of the Suffolk Waste Core Strategy Adopted Version 2011.

Noise Limits

- 7) Noise from all components associated with the anaerobic digestion plant must not exceed 35 dB LAeq at each of the positions indicated on the Plan entitled 'MS/3892/15 Barley Brigg Farm AD – Proposed Noise monitoring positions'.

Reason: To protect the amenity of neighbouring occupiers having regard to Policy WDM2 of the Suffolk Waste Core Strategy Adopted Version 2011.

Noise from Reversing Vehicles

- 8) Only broadband or voice replication reversing alarms shall be employed on the site operators vehicles or plant used on the site.

Reason: To protect the amenity of neighbouring occupiers having regard to Policy WDM2 of the Suffolk Waste Core Strategy Adopted Version 2011.

Silencers

- 9) Silencers shall be fitted to, used and maintained in accordance with manufacturers' instructions on all vehicles, plant and machinery used on the site. No machinery shall be operated with the covers open or removed.

Reason: To protect the amenity of neighbouring occupiers in accordance with policy WDM2 of the Waste Core Strategy Adopted March 2011, and National Planning Policy Framework (NPPF) and its accompanying Technical Guidance.

Loudspeakers

- 10) No sound reproduction or amplification equipment (including public address systems and loudspeakers) which is audible at the nearest noise sensitive location shall be installed or operated on the site.

Reason: To protect the amenity of neighbouring occupiers in accordance with Policy WDM2 of the Waste Core Strategy Adopted March 2011, and NPPF and its accompanying Technical Guidance.

Covering of Waste

- 11) All feedstocks stored at the site shall be stored within the identified clamps and effectively covered to prevent the release of odour or other emissions.

Reason: In the interests of minimising the impact on the amenities of the local area in accordance with Policy WDM2 of the Suffolk Waste Core Strategy Adopted 2011, setting out general considerations relevant to all waste management facilities and which are required in order to make the development acceptable.

Covering of Loads

- 12) All vehicles entering and leaving the site and containing herbs, chicken litter, slurry or digestate shall be effectively covered to prevent the discharge of any material or release of odour or other emissions.

Reason: In the interests of minimising the impact on the amenities of the local area in accordance with Policy WDM2 of the Suffolk Waste Core Strategy Adopted 2011, setting out general considerations relevant to all waste management facilities and which are required in order to make the development acceptable.

Chicken Litter Treatment

- 13) The parts of the clamp/s used to store chicken litter shall be fully emptied and cleaned (hosed down) before each new delivery of chicken litter.

Reason: To reduce the potential for odours or other emissions arising from the long-term storage of chicken litter in accordance with WDM2 of the Suffolk Waste Core Strategy (adopted 2011).

Apple Pulp Treatment

- 14) All apple pulp feedstock shall be utilised within 24 hours of delivery to the site.

Reason: To reduce the potential for odours or other emissions arising from the long-term storage of apple pulp in accordance with WDM2 of the Suffolk Waste Core Strategy (adopted 2011).

Waste Capacity and Origins

- 15) Within any 12 month period only the following feedstocks shall be brought into and processed at the site:

- a) energy crops (4500 tonnes);
- b) sugar beet pulp (4000 tonnes);
- c) chicken litter (2000 tonnes);
- d) apple pulp (2500 tonnes);
- e) herbs (2000 tonnes);
- f) on site slurry; and
- g) on site digestate.

The operator shall keep a record of all imported material, which shall be made available to the Waste Planning Authority upon request.

Reason: To ensure whilst meeting the forecast waste arisings, the waste is treated as close as possible to its source, in accordance with Policy WCS2 of the Waste Core Strategy Adopted Version 2011, setting out general considerations relevant to all waste management facilities and which are required in order to make the development

acceptable.

Lagoon Planting

- 16) No planting shall take place on the lagoon bunds.

Reason: To avoid any adverse impacts on protected and/or priority species.

Permitted Development

- 17) Notwithstanding the provisions of Part 7, Class L, of Schedule 2 of The Town and Country Planning (General Permitted Development) (England) Order 2015, (or any Order amending, replacing or re-enacting that Order), no building shall be extended or altered or plant or machinery replaced without prior planning permission from the Waste Planning Authority.

Reason: to maintain control over the development and to minimise the potential for visual and landscape intrusion as a result of the sites topographic setting. This condition is in accordance Policy WDM2 of the Waste Core Strategy Adoption Version 2011, setting out general considerations relevant to all waste management facilities and which are required in order to make the development acceptable.

Decommissioning

- 18) Within six months of the cessation of the use of the anaerobic digestion plant, a scheme to address the removal of the development and restoration of the land shall be submitted to the Waste Planning Authority. The scheme shall then only be implemented as approved in writing, by the Waste Planning Authority. The submitted scheme shall make provision for:

- a) the removal of site infrastructure including foundations;
- b) the restoration of the land; and
- c) a programme of implementation.

Reason: To ensure the reinstatement of the site, having regard to Policy WDM2 of the Waste Core Strategy Adopted Version 2011, setting out general considerations relevant to all waste management facilities and which are required in order to make the development acceptable.

Reason for recommendation

18. In light of the Development Plan and other relevant material considerations, the application is considered to be acceptable and, subject to conditions, is not considered to cause unacceptable impacts upon the environment and local amenity.

Alternative options

19. To refuse consent or grant consent subject to alternative conditions.

Main body of report

Site

20. The application site comprises a partially constructed AD plant on a level site at Barley Brigg Farm approximately 2.4km east of the village of Stradbroke. The site utilises an existing long-term access to the B1117 Laxfield Road, which is identified in the SCC heavy goods vehicle (HGV) route.

21. The wider site includes the Rattlerow Farms pig rearing unit, a grain store and large open slurry lagoons. The site is located within an open arable landscape characterised by agricultural operations and scattered residential dwellings.
22. The nearest residential receptor is approximately 210m south-west from the site. There are three listed buildings within 500m of the development; the nearest being the Grade II Listed 'Lodge Farmhouse' approximately 220m to the south-east.
23. The site is located within Flood Zone 1 which is assessed as having a less than 1 in 1,000 annual probability of river or sea flooding. All surface water runoff volume from the site, up to the 100yr flood event, can be stored on site within the storage lagoons.
24. The nearest site designated for ecological interest is the Chippenhall Green SSSI which is located approximately 3.3km to the north-east.

Planning History

25. Consent was granted in 2013 by Mid Suffolk District Council (ref: 3219/12) for a 500kw electrical output co-generation combined heat and power plant (CHP) AD facility. Approved feedstock comprised straw-based manure and slurries from the adjacent pig breeding unit and agricultural crops, including silage and sugar beet pulp, most of which would be sourced from the host farm unit.
26. The development has not been constructed fully in accordance with the approved plans.
27. The 'as built' development differs in form from the originally consented proposal as set out below in Table 1. The County Council was made aware of the departure from the original consent by a local complainant.

Table 1		
Factor	Approved AD plant	Development being considered by Committee
Silage clamps	4m to top of wall	3m to top of wall plus 1m rail
CHP engine exhaust or flare	10m	7.5m
Digesters (including dome)	20m and 22m wide and approximately 7.7m above ground	26m wide and approximately 9.3m above ground
Power output of plant (MWe) per hour	500kw	1100kw
Equivalent thermal output	~1mw	2.5mw
Site area	0.9ha	3.03ha (1.9ha approximately for plant area only)

Proposal

28. Permission is sought for the 'as built' development and change of feed sources to include the following feedstocks per annum:
 - a) 6000t slurries and manure from the adjacent pig rearing unit;
 - b) 4500t energy crops;
 - c) 4000t sugar beet pulp;
 - d) 2000t chicken litter;
 - e) 2500t apple pulp; and
 - f) 2000t herbs.

29. The main elements of the proposed facility are the primary and secondary digester tanks, two silage clamps, two digestate dryers, feed hopper, auxiliary flare, standby generator, slurry store feed pit, separator pit and three pumps.
30. The digester dome walls would be faced with green sheet metal and the domes would consist of a membrane coloured light grey.
31. The CHP building, which houses the engine and electrical generation equipment, would consist of green painted steel containers and stainless steel exhaust stacks and gas flare. The silage clamps would have concrete retaining walls and green sheeted silage covers. The site office would consist of a green painted steel demountable building.
32. Two existing farm lagoons located to the west of the development site would be utilised, these are currently used for the open storage of pig slurry. One lagoon would be used for the covered storage of digestate from the AD facility and the other for dirty water storage. A Klargestertype package treatment plant would be provided to deal with on-site foul sewage.
33. Existing trees and hedgerows would be retained and a 6m wide native tree and shrub belt on the northern and eastern site boundary would be planted in the 2016 planting season.

Transport of Feedstocks

34. All feed stocks would be locally sourced as transporting these feed stocks too far undermines their viability for use in the plant.
35. The 6000 tonnes per annum of slurries and manure would come directly from the adjacent pig unit via sealed pipes, resulting in no large vehicle movements on the highway network and a reduction in terms of outgoing movements.
36. The 4500 tonnes per annum of energy crops would be transported from surrounding fields by a mixture of HGV and tractor/trailers from July to September.
37. The 2500 tonnes per annum of apple pulp would be transported by HGV from the Aspoll brewery near Debenham from March to October.
38. The 4000 tonnes per annum of sugar beet pulp would be transported by HGVs that are already taking sugar beet to the factory and collecting pulp as a backload trip resulting in no additional HGV movements. Sugar beet pulp would be delivered from September to February.
39. The 2000 tonnes per annum of herbs would be delivered by tractors from Eye between July and September.
40. The 2000 tonnes per annum of chicken litter would be brought in from Fressingfield by tractor/trailer. Chicken litter would be delivered over three days every 7.5 weeks. Therefore, for 21 days of the year there would be 12 large vehicles a day to the site.
41. Digestate would be removed using agricultural tractor trailer units (solid digestate) and either pumped directly on to adjacent fields or removed by agricultural tractor tankers (liquid digestate). This would be used locally on surrounding agricultural fields.
42. The worse-case scenario of all feedstocks arriving/departing on the same day would result in 14 HGV movements on one day. See Table 2:

Table 2			
Feedstock	Delivery period	Large vehicles per day	Worst case scenario large vehicles (based on one day in Sept)

Herbs	July to September	2 tractor	2
Apple pulp	October to March	(8 HGV per week)	0
Sugar beet pulp	September to February	2 HGV	2
Feedstock	Delivery period	Large vehicles per day	Worst case scenario large vehicles (based on one day in Sept)
Energy crops	July to September	2 HGV/tractor	2
Chicken litter	3 days every 7.5 weeks (21 days a year)	2 tractor	2
Solid digestate	All year	2 tractor	2
Liquid digestate	5 months	4 tanker	4
Slurry	All year	0	0
			Total: 14

Delivery and Storage of Feedstocks

43. Feedstock would be delivered to the site via the existing site access from the B1117 Laxfield Road or directly from the farm and unloaded and stored in covered silage clamps before being supplied to the plant via the feed hopper and feed pit 365 days a year.
44. Approximately 290 tonnes of chicken litter would be delivered every 7.5 weeks (the interval between shed clearances) and added to the AD process gradually before the next delivery, during which time it would be stored within the clamps and covered. The clamp/s used to store chicken litter will be fully emptied and cleaned (hosed down) before each new delivery of chicken litter to avoid the potential build-up of noxious substances.
45. Pig slurry would be pumped directly into the AD plant rather than being stored in lagoons, as currently consented.

Anaerobic Digestion Process

46. Within the primary digester, the feedstock would be exposed to an active micro-bacterial culture and undergoes anaerobic breakdown. The digesters would be heated to an optimal temperature of 52°C and constantly stirred. The part digested material would then be transferred to the second digester where secondary digestion takes place.
47. Bio-gas (a mixture of methane, carbon dioxide and trace impurities) would be collected by the digester units and siphoned off to undergo a purification process to remove all trace impurities which are recycled within the system. The cleaned gas would then be de-watered and burnt in two CHP generators to produce electricity. The generators are expected to run for an average of 347 days per annum and generate up to 1.1MW of renewable electricity every hour 24/7 and transported to the local electrical distribution network via grid connection.

48. A nutrient rich digestate emerges from the system which would be used as a natural fertiliser and soil conditioner on farm land in the form of solid and liquid fractions at specified times of the year.
49. The AD system would be computer controlled, fully automated and a continuous process whilst the plant itself would be completely sealed. The plant has a predicted operational life of 25 years.

Consultations

Mid Suffolk District Council

50. No objection subject to 'appropriate planting to mitigate the visual impact'.

Mid Suffolk Council Environmental Protection Officer

51. No objection.

Councillor Guy McGregor

52. No response.

Stradbroke Parish Council

53. Objection (see Appendix 2). Stradbroke Parish Council considered that the development had become a 'large industrial-scale operation impacting the surrounding area' and objected on grounds of traffic flows and noise pollution.

Fressingfield Parish Council

54. No comment.

Laxfield Parish Council

55. No response.

Wilby Parish Council

56. Objection (see Appendix 3). Wilby Parish Council objected on the grounds on increased traffic flows, noise and odour pollution and the perception that the development was disproportionate to the local community and road network.

Environment Agency

57. No objection.

Suffolk Wildlife Trust

58. 'No ecological survey work appears to have been undertaken in support of this application. However, if the application site meets any of the criteria listed in Suffolk County Council's Local Validation Checklist (July 2015), particularly Appendix A; Table 1, then the proposal should be subject to the appropriate level of ecological assessment. Any such assessment should be undertaken prior to the determination of the application, to ensure that the decision is made having regard to all relevant material considerations (in accordance with ODPM Circular 06/2005, paragraphs 98 and 99).
59. 'Ecological survey work (The Ecology Consultancy, Sep 2011), undertake for a subsequently withdrawn wind turbine application (Mid Suffolk DC reference 3156/11), adjacent to this site recorded at least four species of bat foraging or commuting over the lagoons which fall within the boundary of the current application site. It is therefore essential that this scheme includes appropriate measures to ensure that there are no adverse impacts on bat species, particularly from external lighting.
60. 'The grass banks of the lagoons were also considered to be potentially suitable habitat for reptiles (all protected and UK Priority species); great crested newts (protected and UK Priority species) and hedgehogs (UK Priority species), should these species be present in the area. If

the proposed development is likely to affect any habitats suitable for these species, further assessment should be undertaken to identify the extent of any impact and to allow design of appropriate mitigation measures.'

Suffolk County Council Senior Ecologist

61. No objection. 'In response to Suffolk Wildlife Trust's comments and concerns to this application, I understand that this facility was determined by Mid Suffolk District Council and the majority of the construction has now been completed and there was no semi-natural habitat on the site now being assessed additional to the original Mid Suffolk permission and which has been affected by this development and therefore would have needed to be assessed.
62. 'I support the recommendation for a lighting scheme to be agreed and approved as a condition of any consent, to ensure that impacts on foraging bats will be minimised, and no planting of trees/shrubs on the existing lagoon bunds, to avoid loss of habitat for reptile/amphibians and hedgehogs. This will meet our Biodiversity duty to conserve Protected and Priority species likely to be present & affected by this development.'

Suffolk County Council Highways

63. No objection. 'The existing farm access is acceptable in its current layout and has appropriate visibility splays in either direction. There are no recorded accidents in the recent 5 year period in the vicinity of the existing access and a site visit confirms that the access is suitable for the required vehicles; therefore there is no evidence to suggest that it would be unsafe to intensify the use of the existing farm access.
64. 'I accept that there may be some discrepancies in the assessment in terms of the potential peak HGV flows which may be attributed to this site if the new proposal is implemented and this has been highlighted by the Stradbroke PC in their letter to you. The Traffic Statement suggests that a worst case could be 14 HGV/day, whereas it could be up to 20 HGV/day (based upon a five day week rather than seven) and a greater proportion may be tractors. That said, the site is located in a rural location where HGV's and tractors are not unusual.
65. 'Although I am sympathetic to local residents concerns that it is undesirable for additional HGV's and tractors to use the roads where they live, the site benefits from being connected to the SCC HGV road network. Although the increase in HGV numbers would introduce some delays locally at certain times, and it is highly unlikely that capacity would be a significant problem. In my view the B1117 in the most part is a good quality B Class rural highway capable of safely accommodating additional HGV's.
66. 'Therefore I have no evidence to suggest that allowing additional HGV's to use this part of the road network would be a highway safety problem such that I would recommend that this application was refused on highway safety grounds.'

Suffolk County Council Landscape Officer

67. No objection subject to conditions. 'The site is adjacent to existing farm buildings and dirty water / slurry lagoons. This farmstead is located in open arable, (Plateau Claylands) landscape, in the parish of Stradbroke.
68. 'Views of the site are available from local rights of way highways and some residential properties, in particular Low Farm. It is notable that the Landscape and Visual Impact Assessment submitted identifies impacts on this dwelling, also a listed building, as significant. It is also notable that this document suggests that a planting scheme could make a significant contribution to mitigation within 10 years; however this would require rapid growth rates.
69. 'The proposal can be made acceptable in terms of landscape impact, with an effective and well maintained planting scheme. I suggest that shrubs including, hawthorn dogwood and hazel are planted on the bunds and trees are planted on the top and to the outside of the

bunds. In order to achieve timely mitigation in these difficult planting conditions it may be appropriate in this instance to use a fast growing species such as Aspen (*Populus tremula*) and hybrid poplar (*Populus canadensis*).

- 70. 'As discussed with the applicant on site the landscaping scheme should also include planting along the access road and proposals for fencing around the site.
- 71. 'The proposal can be made acceptable in landscape terms subject to conditions, specifically:
 - a) 'A scheme of soft landscaping and planting;
 - b) 'An agreed scheme of external lighting.'

Suffolk County Council Flood and Water

- 72. No objection.

Suffolk County Council Historic Buildings Officer

- 73. 'No objection. 'Figure 4 of The Landscape Partnership's Visual Impact Assessment identifies a small number of listed buildings in the area surrounding the AD plant. Most of these are farmhouses, together with two barns. The nearest of these are Low Farmhouse, 350m to the north of the site and Lodge Farmhouse some 225m to the south-east. All the buildings are experienced within a rural agricultural landscape with which they have or had a strong functional relationship, and this setting therefore contributes positively to their significance.
- 74. 'The Visual Impact Assessment concludes that initial impact would be of Major to Moderate significance at Low Farmhouse and Minor to Moderate close to Manor Farmhouse. Once the proposed screen planting has matured after ten years, impacts are Minor except at Low Farmhouse where there is a Moderate adverse impact. The impact from Viewpoint 3 (a short distance to the east of Lodge Farm) is assessed as Minor, and Negligible after 10 years, although the photographs and assessment demonstrate that the domes would be clearly visible together with associated structures. This suggests the impact on the setting of Lodge Farmhouse would be Moderate and Minor to Moderate, i.e. similar to the impact on Low Farmhouse. However, the planting to the north of Lodge Farmhouse would screen many views of the AD plant.
- 75. 'The landscape of this clay upland area is able to accommodate change without affecting its overall character, especially if new development is grouped with existing clusters (as here), it is designed to mitigate visual impact (as here) and appropriate levels of screen planting are proposed. In this case the open, agricultural setting of the heritage assets would be maintained, so even where impact is greatest (Low Farmhouse and possible Lodge Farmhouse), the harm would be very much less than substantial.
- 76. 'NPPF paragraph 134 requires the level of harm to be weighed against the public benefits of the proposal. Here, these public benefits, the generation of sustainable energy utilising agricultural bi-products and waste, decisively outweigh the level of harm identified. I therefore consider the impact on the significance of the listed buildings affected to be acceptable.'

County Noise Consultants (SRL)

- 77. No objection subject to recommended conditions.

County Air Quality Consultants (SRL)

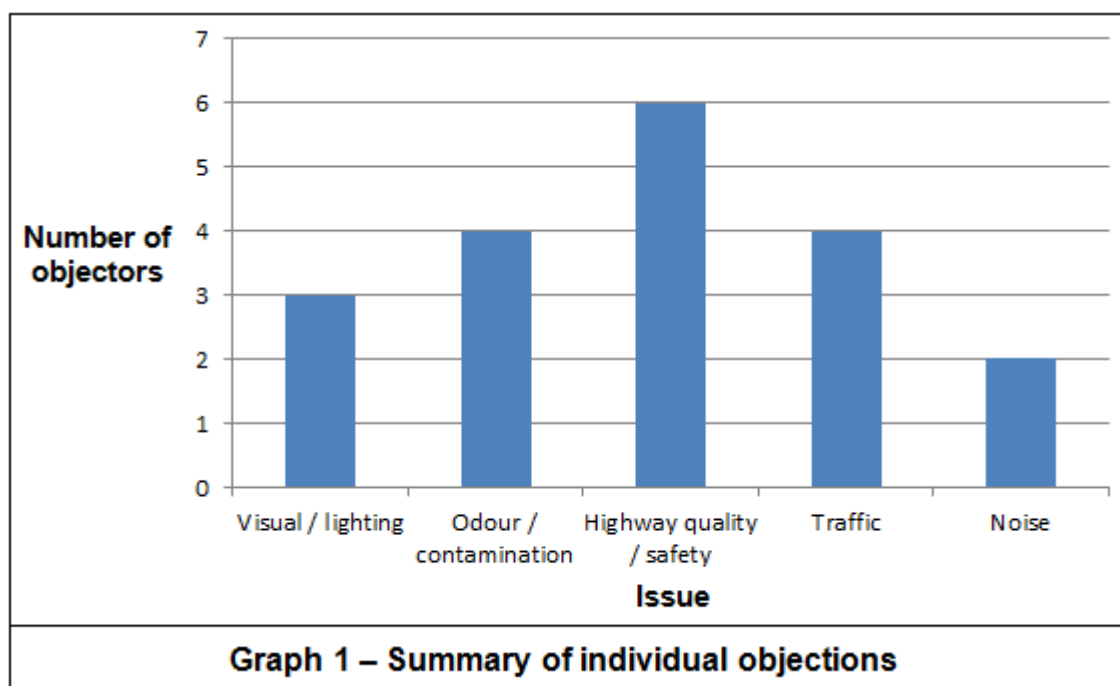
- 78. No objection.

Representations

- 79. 11 objections were received as a result of the site, press and neighbour notices. These objectors include Stradbroke and Wilby Parish Councils and a petition on behalf of four

households ('Ashfield Green Residents'). See Graph 1 for a summary of the issues raised in the eight individual responses. The objections relate to the following issues:

- a) visual impact and lighting disturbance;
- b) odour and contamination;
- c) highway quality and safety;
- d) traffic congestion; and
- e) noise disturbance.



Policies

80. The Government is committed to supporting and expanding sustainable biomass AD plants as set out in the AD Strategy and Action Plan (2011) and Waste Management Plan for England (2013).

National Planning Policy Framework

81. The National Planning Policy Framework (NPPF) states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
82. Paragraph 17 states that planning should encourage the 'development of renewable energy'.
83. Paragraph 32 states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'.

National Planning Policy for Waste

84. The National Planning Policy for Waste states that waste management facilities in themselves should be well-designed, so that they contribute positively to the character and quality of the area in which they are located.

Suffolk Waste Core Strategy (adopted 2011)

85. Policy WCS1 states that 'preference will be given to proposals for waste management facilities in accordance with the Key Diagram where individual sites are well related to the Suffolk Lorry Route Network, centres of population and sources of waste and do not have adverse impacts upon features of environmental importance or endanger human health.'
86. Policy WDM2 outlines general considerations relevant to all waste management facilities including the impact on landscape, impact from noise and impact of vehicle movements and access.
87. Policy WDM5 states the areas in which general waste management facilities are considered in principle to be suitable for location. The areas include the category of 'within or adjacent to Agricultural and Forestry Buildings'.
88. Policy WDM11 states that, having complied with the general considerations set out in Policy WDM2, 'anaerobic digestion facilities will be acceptable on land:
- 'Within the uses identified within Policy WDM5; or
 - 'Integrated with Waste Water Treatment Plants.'
89. Policy WDM19 states that the design of waste management facilities will be considered favourably where they incorporate:
- Designs of an appropriate scale, density, massing, height and materials;
 - Safe and convenient access for all potential users;
 - Schemes for the retention of existing and provision of new landscape features; and
 - Measures which will protect, preserve and where practicable enhance the natural, historic and built environment.

Mid Suffolk Core Strategy (adopted 2008)

90. The application site is located within a Countryside location in the Proposals Map of the superseded Mid Suffolk Local Plan (1998). Policy CS2 of the Mid Suffolk Core Strategy (2008) states that Development in the Countryside will be restricted to defined categories, including waste management facilities, in accordance with other Core Strategy policies.

91. Policy CS3 of the Mid Suffolk Core Strategy (2008) states that the Council will promote and encourage the appropriate development of standalone Renewable Energy schemes.
92. Policy CS4 states that 'development that harms the quality of soil or air and/or causes noise, dust, odour or light pollution will be avoided wherever possible. Development proposals will have no adverse effect on water quality.'
93. Policy CS5 of the Mid Suffolk Core Strategy (2008) states that all development will maintain and enhance the environment, including the historic environment, and retain the local distinctiveness of the area.

Comments of the Head of Planning

Highway Safety

94. 8 objectors stated that the traffic associated with the development had an adverse impact on highway safety. Objectors claimed that HGV and tractor vehicles servicing the development were exacerbating the existing poor quality of the surrounding roads and bringing mud on to the highway. The surrounding roads are said to include pot-holes and eroded verges in addition to being characterised by numerous bends and sections of single track.
95. SCC Highways describe the B1117 Laxfield Road serving the site as a rural highway capable of safely accommodating additional HGV's. This highway is identified as a local access route on the Suffolk Lorry Route Network meaning that it has been identified as a suitable route for HGVs or Lorries.
96. SCC Highways state that the existing farm access is acceptable in its current layout and has appropriate visibility splays in either direction. Furthermore, according to SCC Collision Data, no personal injury accidents have been recorded at the access serving the site or on the approaches to the existing access.
97. There is no evidence to suggest that the use of the existing farm access and surrounding roads by vehicles associated with the site would result in a significant adverse impact on local amenity or safety. Therefore, the development is not considered to have a significant adverse impact on highway quality or safety.

Large Vehicle Flows

98. 7 objectors raised the issue of disturbance arising from HGV and tractor flows associated with the plant on roads surrounding the site.
99. The Transport Statement (as amended) suggests that a worst case scenario of 14 large vehicle movements per day at the site access. The volume of large vehicle traffic is not considered to represent a material increase, even considering the concentrated nature of certain deliveries at certain times of the year.
100. SCC Highways have stated that the site is located in a rural location where HGV's and tractors are not unusual and that it is 'highly unlikely that capacity will be a significant problem.'
101. Paragraph 32 of the NPPF states that 'development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.'
102. There are not considered to be significant direct or cumulative adverse impacts arising from the increased vehicle flows associated with the development.

Air Quality

103. The issue of air quality has been raised by six objectors. They state that an unpleasant odour is noticeable at surrounding residences.
104. Currently, pig slurry is kept in open lagoons. However, pig slurry would be pumped directly to the AD system. Therefore, odour concentrations are predicted to significantly decrease at all

receptor locations. The development is therefore likely to have a beneficial impact on local amenity. Furthermore, no odour complaints have been made regarding the existing operations at the site.

105. In order to ensure that potential odours and other emissions are minimised, it is recommended that all feedstock materials shall be stored within clamps and kept covered (see Condition 10 in paragraph 6 of this report).
106. Vehicles entering and exiting the site and containing chicken litter, apple pulp, slurry or digestate shall be effectively covered to prevent the release of odours and other emissions (see Condition 11 in paragraph 6 of this report). Furthermore, the area of the clamp used to store chicken litter would be fully emptied and cleaned (hosed down) before each new delivery in order to prevent the build-up of noxious substances (see Condition 12 in paragraph 6 of this report).
107. In light of the closed nature of the AD process coupled with the mitigatory measures proposed for the handling of feedstock and the beneficial changes to the lagoon storage, there are not considered to be significant impacts on air quality.

Ecology

108. With regard to the question of whether biodiversity assessment is required, as raised by the Suffolk Wildlife Trust, it is not considered necessary for this application as the site area additional to the original consent comprised arable land of minimal ecological value. Under the Local Validation Checklist, an ecological assessment would be considered necessary in cases where a Protected or Priority species would be affected by the development. However, in this case, it is the opinion of the Suffolk County Council Senior Ecologist that such species on or adjacent to the site would not have been adversely affected by the construction for this application so as to require assessment.
109. In line with the recommendations of the Senior Ecologist, a condition (Condition 16 in paragraph 6) would be applied to ensure that there would be no planting of shrubs/trees on the lagoon bunds (in order to avoid the loss of habitat for reptile/amphibians and hedgehogs) alongside a condition (Condition 5 in paragraph 6) requiring a scheme of lighting to be agreed and approved (to ensure that impacts on foraging bats would be minimised). The Suffolk County Council Senior Ecologist considers that these measures would avoid any adverse impacts from development on protected or priority species as required by Conservation of Habitats & Species Regulations 2010, Natural Environment and Rural Communities Act 2006 and s17 Crime and Disorder Act 2009.

Noise

110. The issue of noise disturbance from the plant has been raised by five objectors. Stradbroke Parish Council stated that a number of property owners to the north of the site have raised concerns regarding a humming noise from the plant. The noise impact assessment submitted with the application found that with ideal propagation conditions it would be possible to hear the noise from the AD site as a low level hum but the impact is 'very low and well below what would be described as a "significant impact"'.
111. Provided that the site is operating with the stipulated noise limits, as required by Condition 7 (see paragraph 6 of this report), then noise levels at surrounding properties would be low. Noise may be audible / noticeable but significantly (15 to 20 dB) below the World Health Organisation (WHO) guidelines and should also meet the definition of "No observed affect" as defined in "Planning Practice Guidance - Noise" (PPG - Noise) and "National Planning Statement for England" (NPSE).

112. Conditions 6 to 10 (see paragraph 6 of this report) would effectively mitigate any noise disturbance and therefore the development is considered to be acceptable in terms of noise impact. The conditions identify locations for noise monitoring (see Appendix 1 for locations).

Landscape Impact

113. The issue of adverse visual impact arising from the development has been raised by five objectors.
114. The AD Plant introduces limited visual effects on the wider landscape as compared to those of the originally consented scheme. Both the Landscape and Visual Impact Assessment (LVIA) and SCC Landscape Officer consider that the landscape impacts of the proposal can be improved by an effective and well maintained planting scheme to complement the existing hedgerows and bunds. The SCC Landscape Officer has suggested fast growing species for screening in order to ensure that the development is effectively screened.

Impact on Designated Historic Assets

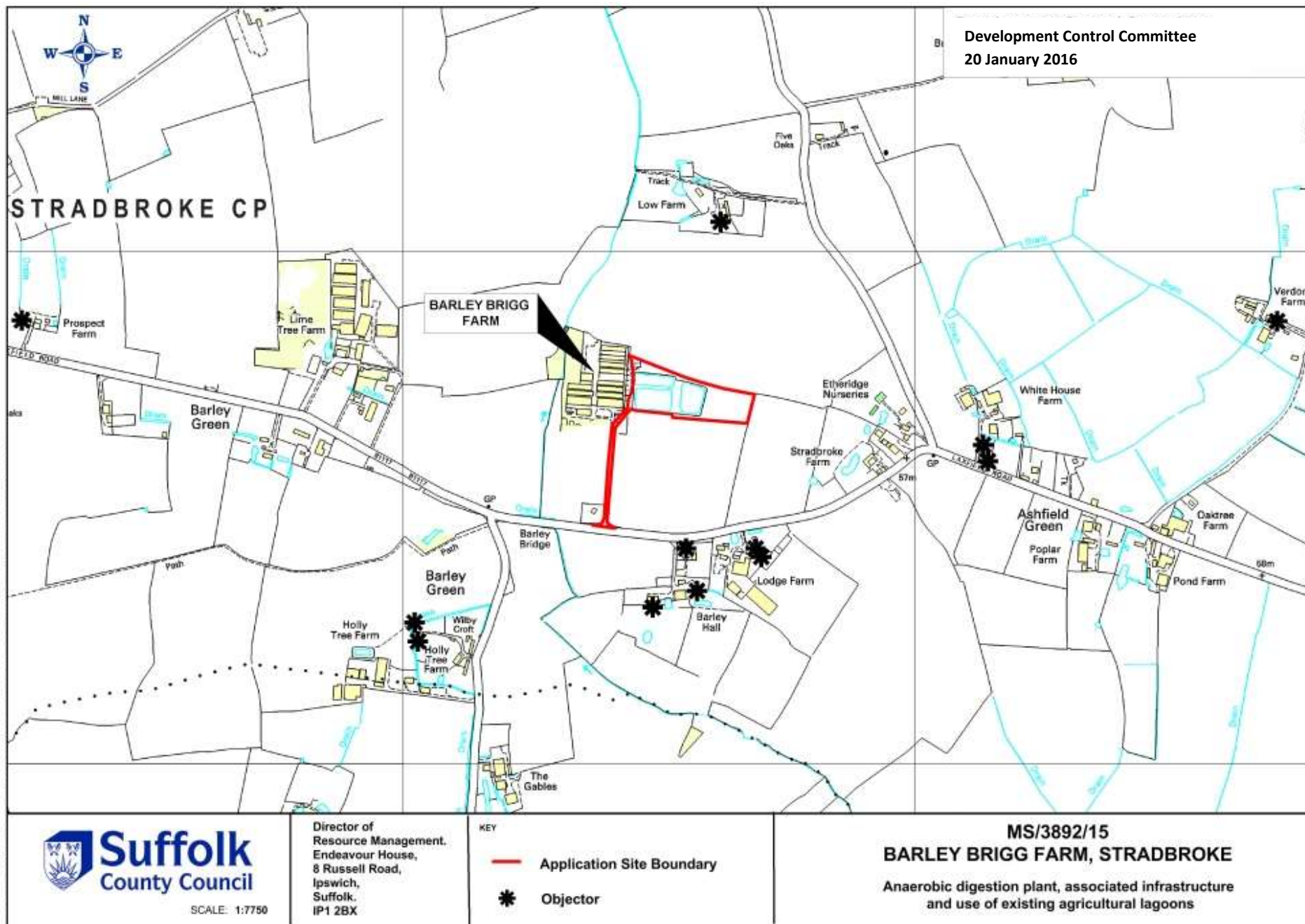
115. There are three listed buildings within 500m of the development; the nearest being the Grade II Listed 'Lodge Farmhouse' approximately 220m to the south-east.
116. The LVIA states that, even taking screening into account, the Grade II Listed Low Farm would experience a change in visual quality of 'moderate significance' due to the digester domes being visible at particular times of year. However, it is considered that there are no major residual effects on this receptor when compared with the previously consented scheme.
117. The SCC Historic Buildings Officer states that any harm to listed buildings would be very much less than substantial. NPPF paragraph 134 requires the level of harm to be weighed against the public benefits of the proposal.
118. In this case, the public benefits of renewable energy generation are considered to outweigh the less than substantial harm to surrounding listed buildings.

Conclusion

119. The proposed AD process would reduce the greenhouse gas (GHG) emissions that are associated with landfill disposal, recover energy and produce bio-fertilisers.
120. The proposed development is in general accordance with the Development Plan, which is considered to be up to date in terms of waste policy. Subject to the recommended conditions, the development would not have a significant adverse impact on the natural environment and general amenity in accordance with the NPPF.
121. In conclusion, I recommend this application for approval, subject to conditions.

Sources of further information

- a) File reference: MS/3892/15
- b) The application and consultee responses can be viewed at:
<https://secure.suffolkcc.gov.uk/ePlanning/loadFullDetails.do?aplId=21059>
- c) The Planning Officers file is an open file and can be consulted by prior appointment with the case officer Sean Cunniffe 01473 265903 at the Development Section, Endeavour House, 8 Russell Road, Ipswich, Suffolk, IP1 2BX.





Director of
Resource Management
Endeavour House
8 Russell Road
Ipswich, Suffolk
IP1 2BX

Development Control Committee
20 January 2016

AERIAL PHOTO – BARLEY BRIGG FARM,
STRADBROKE



