

We object to the proposed development of a waste management facility at NE Grain on the following grounds:

1. The proposed anaerobic digester (AD) does not appear to be compatible with local and national planning policies,
2. The proposed increase in traffic will have a detrimental impact on the health and lives of the residents of Longhirst village,
3. The proposal fails to provide adequate information concerning odour management strategies.

1. Green Belt: The proposed development lies within Green Belt land as designated under policy S5 of the Northumberland Structure Plan. The subject proposal is defined as a waste management facility since it refers to the anaerobic digestion of farmyard manure in an off-farm location with feedstock being transported to the site (paragraph 3.9 Planning Statement).

The Northumberland County Council Waste Local Plan Policy OW4, Anaerobic Digestion states: *“Proposals for AD plants for farm slurry or sewage sludge will only be permitted where they can be satisfactorily located within or in close proximity to the existing farm complex [...] to which they relate.”*

By sourcing waste from across Northumberland this proposal appears to fail this test.

For all AD proposals, regardless of greenbelt status, the policy states *“proposals for anaerobic digestion plants for other waste will only be permitted where they can be satisfactorily located adjacent to an existing landfill site or waste transfer station, or on an industrial site.”*

The current site is not a landfill site, waste transfer station nor industrial site so also appears to fail this test.

Paragraph 147 of the National Planning Policy Framework states: *“When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. [...] developers will need to demonstrate very special circumstances if projects are to proceed. [This] may include wider environmental benefits associated with increased production of energy from renewable sources.”*

The proposal does not demonstrate clearly why any proposed environmental benefits associated with production of energy are of specific relevance to the Longhirst site. The proposal does not provide life-cycle analysis or a carbon budget for renewable energy production in order to demonstrate the proposed, significant environmental benefit.

The proposal does not meet the high bar of demonstrating “very special circumstances”.

2. Highways and Traffic: According to the information provided in the application (Addendum Transport Statement p. 24), heavy goods traffic in the area will increase from current levels (approximately 12.7K journeys per annum) to between 23K to 33K journeys per annum - depending on assumptions regarding NE Grain opening times and the numbers of days per week deliveries will be received. This will have a detrimental impact on Longhirst village and its residents as approximately 81% of all traffic to and from NE grains comes through the village (Transport Statement, paragraph 3.6.2).

The proposed increase in heavy goods traffic will have a significant and detrimental effect on the health and well-being of the villagers of Longhirst.

At present, movement of heavy goods peaks during the harvest period. This results in diesel and noise pollution in the village that is exacerbated as HGVs and tractors form queues at the junction between the C125 and B1337 and idle in traffic jams due to the narrow roads. The proposal will extend this to a year-long problem.

In 2019 the UK government’s Clean Air Strategy states air pollution as the top environmental risk to human health in the UK. Particulate matter from diesel exhaust is particularly harmful. Long-term exposure is linked to cardiovascular and respiratory diseases, lung cancer and is indirectly linked to dementia.

The proposal did not propose adequate traffic control measures for maintaining air quality and reducing congestion in the village.

3. Amenity issues - odour: We have concerns regarding the proposed use of cattle Farm Yard Manure (FYM) and chicken manure and the proposals for its storage. Unlike the proposed use of cereal grains, grass and maize silage - which will be covered, the application states that FYM and chicken manure will be left uncovered (Odour Assessment document paragraph 2.3.2).

According to the Institute of Air Quality Management, good practise for odour control includes a detailed breakdown of who is responsible for monitoring odour, who is responsible for taking action if a problem arises, as well as clear descriptions of what would need to happen to trigger various remedial responses - including off-site complaints of odour. Named individuals are responsible for monitoring and responding to complaints; including taking appropriate remedial action to prevent recurrence.

The proposal did not provide satisfactory information on this point.